Draft Environmental Assessment Master Plan for the Army National Guard Warrior Training Center at Camp Butler, Ft. Benning, Georgia

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DRAFT ENVIRONMENTAL ASSESSMENT MASTER PLAN
for the
ARMY NATIONAL GUARD WARRIOR TRAINING CENTER
AT CAMP BUTLER, FT. BENNING, GEORGIA

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ACRONYMS AND ABBREVIATIONS

ACM	Asbestos containing material
AR	Army Regulation
BMPs	Best Management Practices
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
COA	Course of Action
CTC	Collective Training Center
DA	Department of the Army
DoD	Department of Defense
EA	Environmental Assessment
ESPCP	Erosion Sedimentation Pollution Control Plan
EIS	Environmental Impact Statement
EO	Executive Order
ºF	Fahrenheit
GDNR	Georgia Department of Natural Resources
FNSI	Finding of No Significant Impact
FY	Fiscal Year
GaARNG	Georgia Army National Guard
gpd	gallons per day
HQDA	Headquarters Department of the Army
INRMP	Integrated Natural Resources Management Plan
LBP	Lead based paint
LEED	Leadership in Energy and Environmental Design
LPE	Landbird Population Estimates
LID	Low Impact Development
MACOM	Major Army Command
MBTA	Migratory Bird Treaty Act
MCoE	Maneuver Center of Excellence
MFR	Memorandum For the Record
mgd	million gallons per day
MOU	Memorandum of Understanding
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NGB	National Guard Bureau
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
NPDES	National Pollution Discharge Elimination System
PAM	National Guard Pamphlet
PBG	Potential Breeding Groups
PCBs	polychlorinated biphenyls
PIF	Partners in Flight
POL	Petroleum, oil, and lubricants
RCW	Red-cockaded woodpecker
sf	square feet
SHPO	State Historic Preservation Office
SOC	Species of Concern
SPCC	Spill, Prevention, Control, and Countermeasure
SWMU	Solid Waste Management Unit
UEAs	Unique Ecological Areas
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
USGBC	U.S. Green Building Council
WTC	Warrior Training Center

EXECUTIVE SUMMARY

This Environmental Assessment (EA) provides an analysis of the effects on the natural and human environment that would result from the construction and operation of a Collective Training Center (CTC) at the Army National Guard (GaARNG) Warrior Training Center (WTC) located on Camp Butler, collocated on Fort Benning, Georgia.

The ARNG proposes to establish a CTC at Camp Butler's WTC to meet the mission of training and to instill Soldiers with the mental and physical abilities to thrive at all levels of modern warfare. Implementation of the CTC includes construction of new facilities, upgrades to utility infrastructure, as well as new construction, expansion and refurbishment of the existing obstacle course and physical fitness areas. These actions would occur within the confines of Camp Butler.

Two alternatives and their respective primary environmental effects are considered in this document. Table ES-1 presents a summary comparison of potential impacts among the alternatives. As this information indicates, in general, minor, temporary impacts would result.

Table ES-1 Comparison of Impacts for Each Resource

Resource	Alternatives	
	No Action	**Proposed Action**
Land Use	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.	No adverse impacts on land-use condition would occur. Military missions and requirements would continue to be met.
Geology and Soils	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.	Minor, short-term impacts to soils from demolition and construction activities. Continued, long-term minor impacts due to WTC training, operations, and maintenance activities.
Water Resources	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.	Minor, short-term adverse impacts are expected to surface water quality during construction; no impacts to wetlands, impaired waterways, or groundwater. Only minor long-term adverse impacts are anticipated due to training, operations, and maintenance activities.
Biological Resources	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.	Minor adverse impacts to wildlife are anticipated in the short -term. Impacts to water quality and habitat could be effectively minimized through the use of soil erosion BMPs. There would be no adverse impacts to aquatic flora and fauna, state-listed species, or Federally-listed species.

Table ES-1 Comparison of Impacts for Each Resource

Resource	Alternatives	
	No Action	**Proposed Action**
Infrastructure	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged. However, parking would remain limited and access to the WTC would continue to be compromised under the No Action alternative. Therefore, the No Action alternative could incur long-term, adverse impacts to transportation and traffic flow.	Short-term, minor adverse impacts during construction to transportation and traffic flow with removal of Roselle Road and construction of main road and parking areas. Beneficial, long-term impacts would result upon WTC Complex completion from enhanced traffic flow with the new main road access and increases in parking space. There would be no adverse impacts to utilities.
Hazardous and Toxic Materials and Waste	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.	No adverse impacts relative to hazardous and toxic materials and waste are expected.

Proposed Action Alternative

Under the proposed action, the ARNG would construct:

- Officer/staff and troop barracks and a dining facility;
- Physical fitness center with pool;
- Battalion vehicle shelters;
- Medical clinic;
- A Training Device/Simulation Center and general instruction building; and
- Motorpool and personnel vehicle parking areas, as well as access roads.

No Action Alternative

Under the No Action alternative, the ARNG's proposed projects to establish a CTC would not be constructed and existing WTC facilities and operations would remain unchanged. Without implementation of the proposed action, the WTC would continue to operate in inadequate facilities with increased maintenance costs with possible interference with the WTC's ability to meet mission requirements.

ENVIRONMENTAL CONSEQUENCES

The EA analysis demonstrated that with adherence to applicable Federal and state environmental laws, regulations, and permitting processes, no significant adverse environmental impacts would result from the proposed action. This determination is based on the following findings:

- Erosion control best management practices (BMPs) (e.g., silt fencing and soil covering) as prescribed under the National Pollution Discharge Elimination System (NPDES) would minimize the potential adverse effects to soils and water quality that may result from construction. Potential effects are not likely to become significant as no water quality regulatory thresholds (i.e. turbidity) are expected to be exceeded, nor will minor, short-term and mitigated sedimentation impacts affect GA stream antidegredation policy or current stream use designations.
- Soil erosion would be kept to a minimum, and potential contamination during construction would be minimized by following existing Fort Benning procedures required under construction contracts, and applicable Federal and state laws and regulations. No impaired waterways are within the vicinity of the proposed action.
- No adverse impacts to wildlife or threatened and endangered species and habitat are anticipated in the short or long term; the use of NPDES BMPs for soil erosion prevention would protect vegetation, water quality, and habitat from sedimentation.
- Beneficial, long-term impacts would result upon WTC Complex completion from enhanced traffic flow with the new main road access and increases in parking space.
- Beneficial impact on land-use activity would occur because military missions and requirements could be met.
- No significant adverse cumulative impacts would result from implementing the proposed action.

No significant adverse environmental impacts would result from the No Action alternative. This determination is based on the fact that baseline conditions would remain unchanged.

In accordance with NEPA Regulations, the ARNG must indicate if any mitigation measures would be needed to implement the proposed action. While there are no significant adverse impacts that need to be mitigated under the proposed action, it was determined that minimization of minor adverse impacts would be required for impacts to soil, water, and biological resources. No other resource impacts or the No Action alternative would need measures to minimize impacts.

Actions to minimize the impact on soil resources include:

- Application of Federal and state erosion control and NPDES requirements, including NPDES BMPs, would minimize impacts to insignificance during construction.
- Continued adherence to applicable Federal and state laws and regulations would minimize impacts due to training, operations, and maintenance activities in the long term.

Actions to minimize the impact on water resources include:

- Application of LID and NPDES BMPs would minimize sedimentation into adjacent waterways during construction.
- Continued adherence to applicable Federal and state laws and regulations would minimize impacts due to training, operations, and maintenance activities in the long term.

Actions to minimize the impact on biological resources include:

- Use of BMPs for soil erosion prevention to protect vegetation, water quality, and habitat.

CONCLUSION

The proposed action has the potential to have short-term, minor adverse impacts to soil, water, biological, and infrastructure resources. However, implementation of the proposed action as prescribed, including implementation of measures to minimize impacts, would likely not produce any significant adverse direct, indirect, or cumulative impacts. Implementation of this alternative and these measures would reduce identified impacts to acceptable levels and best fulfill the purpose of and need for the proposed action, allowing the ARNG to accomplish its mission while minimizing potential impacts to the environment. Therefore, an EIS is unnecessary for implementation of the proposed action and issuance of a Finding of No Significant Impact (FNSI) is appropriate.

1.0 PURPOSE AND NEED FOR THE PROPOSED ACTION

1.1 INTRODUCTION

The Army National Guard's (ARNG) Warrior Training Center (WTC) is headquartered at Camp Butler, collocated on Fort Benning through license agreements. Found about 100 miles south, southwest of Atlanta, Georgia (Figure 1-1), Camp Butler encompasses 42.7 acres and is accessed by the following major highways: Interstate 185, U.S. Route 27, and Georgia Highway 280, along with other smaller county and Fort Benning-maintained roads. The ARNG is proposing numerous construction projects at the WTC, including new buildings, access roads, and parking areas, in order to replace existing WTC aging and substandard facilities at Camp Butler, as well as train Soldiers to meet new requirements.

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 and Council on Environmental Quality (CEQ) implementing regulations (40 Code of Federal Regulations (CFR) Parts 1500-1508), the Army NEPA regulation 32 CFR Part 651 (*Environmental Analysis of Army Actions*), and National Guard Bureau's (NGB) NEPA Handbook (*Guidance on Preparing Environmental Documentation for Army National Guard Action in Compliance with the National Environmental Policy Act of 1969*). These regulations and guidance documents establish a process by which the Department of the Army (DA) NGB considers and documents potential environmental and socioeconomic effects of proposed actions and alternatives; invites comments on the analysis presented in the EA from local, state, and Federal regulating agencies, as well as from interested citizens and organizations; and then reaches the final decision based on this process. If the analysis presented in this EA indicates implementing the proposed action would not result in significant environmental or socioeconomic impacts, then a Finding of No Significant Impact (FNSI) would be prepared. If a significant impact would result and cannot be minimized/mitigated, issuance of a notice of intent to prepare an Environmental Impact Statement (EIS) would be required. CEQ regulations specify that an EA should briefly provide evidence and analysis for determining whether to prepare an EIS or a FNSI, aid in an agency's compliance with NEPA when an EIS is not necessary, and facilitate preparation of an EIS when one is necessary.

1.2 PURPOSE AND NEED

The WTC is a national resource providing world-class staff, training, and facilities for the ARNG and sister services. The goal of the WTC is to train and instill Soldiers with the mental and physical abilities to thrive at all levels of modern warfare. To support this effort the WTC provides specialized training opportunities to ensure that both Active and Reserve Army components are flexible, adaptable, and capable of working together in a number of situations (GaARNG 2007).

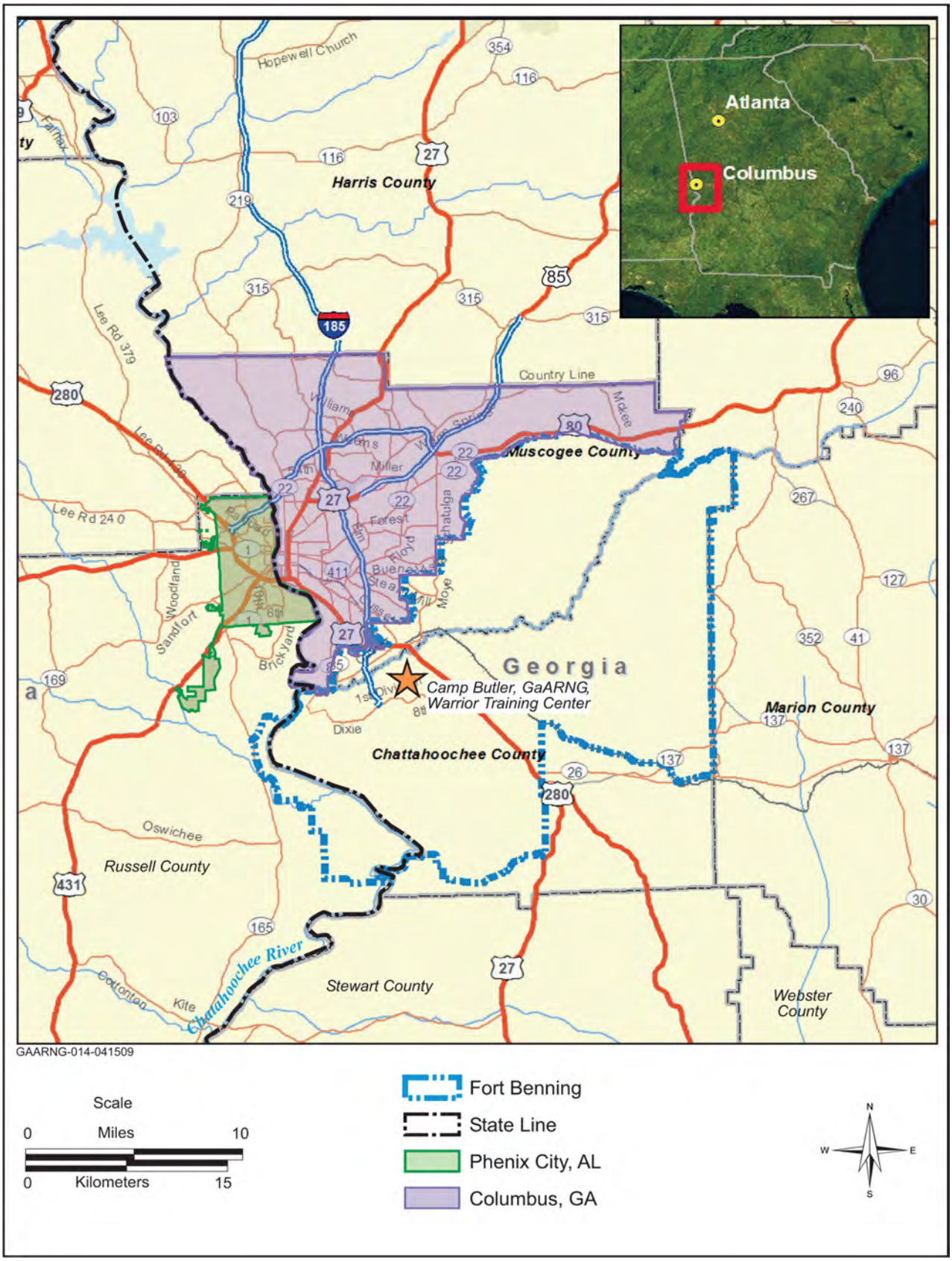

Figure 1-1 Location of Warrior Training Center on Fort Benning

The proposed demolition and construction is needed because the some of the existing facilities are over 50 years old and space is insufficient to meet current training requirements. Renovation and repair work would be too costly and would not meet current Army and NGB space requirements.

The WTC, therefore, must be redesigned and enhanced to become a strategic, multi-dimensional, and multi-functional complex to meet mission requirements while supporting the Reserve and Active Duty Army, and sister services in warrior training.

The WTC Master Plan (GaARNG 2007) incorporated these needs for redesign and enhancement and recommended the ARNG replace the existing buildings and infrastructure deemed insufficient to meet training requirements with a Collective Training Center (CTC). The new CTC would support a battalion-sized unit of around 600 Soldiers with facilities to support administrative, instructional, training, medical, and housing functions (National Guard Pamphlet [PAM] 415-12). The purpose of the proposed action, therefore, is to implement construction of the CTC facilities that would cover the deficiencies identified at the existing WTC and promote a campus-like facility layout and atmosphere.

The current WTC complex (Figure 1-2) supports 142 permanent positions, and approximately 6,500 students were cycled through the WTC in 2009. The WTC is composed of eight buildings: administrative and support activities occur in Building 4155; company classrooms, offices, and latrines are located in Buildings 4153, 4157, and 4159; Buildings 4156, 4160, and 4161 are barracks with latrines and laundry rooms; and Building 4158 is the secure supply area and arms room. The battalion aid station and gym are collocated in Building 4159.

The new facilities would provide students with barracks, dining, and latrine facilities; support traditional classroom instruction, simulated training, and physical training (to include a swimming pool and outdoor running track); shelter maintenance areas for wheeled vehicles; and medical clinic. Based on the required property assets and necessary infrastructure such as roads and parking areas, approximately 15 acres of land would be needed to support development at the WTC.

Training occurs in the 20-acre annex to the west and includes a physical training area, obstacle course, and rappel tower. Other unit-level (mounted and dismounted) and weapons training are done on established Fort Benning training areas and ranges. Paved parking is provided adjacent to Buildings 4155 and long term parking is available at the intersection of Eighth Division and Birney Roads. No other on-site paved parking or unpaved parking is available. Students must park off-site and be shuttled to the WTC before and after courses.

Figure 1-2 Existing WTC Site on Camp Butler

1.3 SCOPE OF ENVIRONMENTAL ASSESSMENT

Two courses of action are considered within this EA: the proposed action and the No Action alternatives. The proposed action alternative for the ARNG WTC would undertake construction of facilities to support a CTC at Camp Butler, Georgia. The CTC construction would include new buildings, new and expanded parking areas, improved access roads, limited existing facility expansion/renovation, as well as infrastructure improvements to potable-, waste-, and storm-water systems and electrical and telecommunication lines. Under the No Action alternative, a new CTC would not be established; thus, no new construction or improvements to existing infrastructure would occur.

1.4 AGENCY AND PUBLIC PARTICIPATION

The ARNG invites public participation in their Federal decision-making through the NEPA process. Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public having a potential interest in the proposed action, including minority, low-income, and disadvantaged persons and Native American Tribes, are urged to participate in the decision-making process. A scoping and information request letter was prepared and mailed to government agencies to obtain information concerning the proposal and to identify any potential issues under their purview (Appendix A). An advertisement in a local newspaper announced the availability of the draft EA and 30-day comment period. Copies of the EA were made available in local libraries, posted to a website at http://www.benning.army.mil/garrison/DPW/EMD/legal.htm and sent to those who requested copies (Appendix A). The ARNG will consider comments received during the 30-day comment period and integrate relevant issues and concerns into the final EA. The availability of the final EA and, if applicable, draft FNSI will be announced and the documents distributed to local libraries, interested citizens, and agencies. Following a final review period, the ARNG will, if applicable, sign and execute the FNSI and proceed with the proposed action.

1.5 REGULATORY FRAMEWORK

A decision on whether or not to proceed with the proposed action will be based on numerous factors such as mission requirements, schedule, availability of funding, and environmental considerations. In addressing environmental considerations, the ARNG is guided by several relevant statutes, their implementing regulations, and executive orders (EO) that establish standards and provide guidance on environmental and natural resource management and planning procedures. These include, but are not limited to the following considerations.

1.5.1 National Environmental Policy Act

NEPA (42 United States Code [USC] 4321–4347) is a Federal statute requiring the identification and analysis of potential environmental impacts of proposed Federal actions before those actions are taken. NEPA legislates a structured approach to environmental impact analysis that requires Federal agencies to use an interdisciplinary and systematic approach in their decision-making process. This process evaluates potential environmental consequences associated with a proposed action. The intent of NEPA is to protect, restore, or enhance the environment through well-informed Federal decisions. The process for implementing NEPA is codified in 40 CFR Part 1500–1508, *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*. The CEQ was established under NEPA to implement and oversee Federal policy in this process. To this end, CEQ regulations specify that an EA be prepared to:

- briefly provide evidence and analysis for determining whether to prepare a FNSI or EIS;
- aid in an agency's compliance with NEPA when an EIS is unnecessary; and
- facilitate preparation of an EIS when one is necessary.

1.5.2 Army Regulations

In addition to NEPA, this EA has been prepared in accordance with two DA regulations that provide guidance for environmental analysis.

- The Army NEPA Regulation, 32 CFR 651, *Environmental Analysis of Army Actions,* implements NEPA by providing policy, responsibilities, and procedures for integrating environmental considerations into Army planning and decision making. It establishes criteria for determining which of five review categories a particular action falls into, and thus, what type of environmental document should be prepared. Based on this guidance, it was determined that the proposed action (described in section 2.1) for the WTC should be addressed in an EA.
- Army Regulation (AR) 200-1, *Environmental Protection and Enhancement,* describes DA responsibilities, policies, and procedures to preserve, protect, and restore the quality of the environment. This regulation incorporates a wide range of applicable statutory and regulatory requirements.
- NGB NEPA Handbook, *Guidance on Preparing Environmental Documentation for Army National Guard Action in Compliance with the National Environmental Policy Act of 1969*, provides detailed information on the preparation, review, and processing of ARNG NEPA analysis, responsibilities of participants in the NEPA process, supplementary reference materials, and recommendations for effective compliance.

1.5.3 Integration of Other Environmental Statutes and Regulations

To comply with NEPA, the planning and decision-making process for actions proposed by Federal agencies involves a study of other relevant environmental statutes and regulations. The NEPA process, however, does not replace procedural or substantive requirements of other environmental statutes and regulations. It addresses them collectively in the form of an EA or EIS, which enables the decision maker to have a comprehensive view of major environmental issues and requirements associated with the proposed action. According to CEQ regulations (40 CFR 1500.2), the requirements of NEPA must be integrated "with other planning and environmental review procedures required by law or by agency so that all such procedures run concurrently rather than consecutively." This EA examines potential effects of the proposed action and No Action alternative on 11 resource areas including land use; air quality; noise; geology and soils; water resources; biological resources; cultural resources; socioeconomics and environmental justice; utility infrastructure; and hazardous and toxic materials/wastes. The following paragraphs present *examples* of relevant laws, regulations, and other requirements that are often considered part of the analysis. To ensure compliance, all applicable laws, regulations, and requirements particular to a specific resource area will be addressed in the EA analysis.

1.5.3.1 Air Quality

The Clean Air Act (42 USC 7401–7671g) establishes Federal policy to protect and enhance the quality of the nation's air resources and to protect human health and the environment. The Clean Air Act requires that adequate steps be implemented to control the release of air pollutants and prevent significant deterioration in air quality.

1.5.3.2 Noise

The Noise Control Act of 1982 and the Quiet Communities Act of 1978 contain language outlining the responsibilities of Federal agencies to protect the public from noise impacts. To comply with the intent of Congress, the Air Installations Compatible Use Zones Department of Defense Instruction 4165.57 provides guidance to military departments regarding the compatible use of public and private lands near military airfields by implementing the Installation Environmental Noise Management Program (AR 200-1, Chapter 7). Fort Benning has responsibility for developing an Installation Environmental Noise Management Program for noise management at Lawson Army Airfield as well as training areas and ranges throughout the Installation, including Camp Butler.

1.5.3.3 Water Resources

The Clean Water Act of 1977 and the Water Quality Act of 1987 (33 USC 1251 *et seq.*, as amended) establish Federal policy to restore and maintain the chemical, physical, and biological integrity of the

nation's waters and, where attainable, to achieve a level of water quality that provides for the protection and propagation of fish, shellfish, as well as wildlife, and recreation in and on the water. Federal agencies are directed to consider the proximity of their actions to or within floodplains. Where information is unavailable, agencies are encouraged to delineate the extent of floodplains at their site.

Section 438 of the Energy Independence and Security Act of 2007 requires federal agencies to develop and redevelop facilities that are greater than 5,000 square feet in a manner that maintains or restores the predevelopment hydrology with regard to temperature, rate, volume, and duration of flow to the maximum extent technically feasible. EO 11990 (*Protection of Wetlands*) requires that Federal agencies provide leadership and take actions to minimize or avoid the destruction, loss, or degradation of wetlands and preserve and enhance the natural and beneficial values of wetlands. The Clean Water Act, under section 404, contains provisions for protecting wetlands and establishes a permitting process for activities having potential effects in wetland areas. Wetlands, rivers, and open water systems are considered waters of the United States and, as such, fall under the regulatory jurisdiction of the U.S. Army Corps of Engineers.

1.5.3.4 Biological Resources

The Endangered Species Act of 1973 (16 USC 1531 *et seq*.) requires Federal agencies that fund, authorize, or implement actions to avoid jeopardizing the continued existence of Federally-listed threatened or endangered species, or destroying or adversely affecting their critical habitat. Federal agencies must evaluate the effects of their actions through a set of defined procedures, which can include preparation of a biological assessment and formal consultation with the U.S. Fish and Wildlife Service. The Migratory Bird Treaty Act of 1918 (16 USC 703 *et seq*.) protects all migratory birds as well as any part, nest, or egg of any such bird.

1.5.3.5 Cultural Resources

The National Historic Preservation Act of 1966 (NHPA) (16 USC 470 *et seq*.) provides the principal authority used to protect historic properties, establishes the National Register of Historic Places (NRHP) (section 101), and defines the requirements for Federal agencies to consider the effects of an action on properties on or eligible for the NRHP (section 106). The Archaeological Resources Protection Act of 1979 (16 USC 470 *et seq*.) ensures that Federal agencies protect and preserve archaeological resources on Federal or American Indian lands and establishes a permitting system to allow legitimate scientific study of such resources. The intent of the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) (25 USC 3001-3013) is to identify proper ownership and to ensure the rightful disposition of cultural items that are currently in Federal possession or control. NAGPRA also requires that certain procedures be followed when there is an intentional excavation of or an inadvertent discovery of cultural

items. The American Indian Religious Freedom Act (42 USC 1996 and 1994 amendments) requires Federal agencies to respect the practice of traditional American Indian religions, including access to religious sites and use of ceremonial items.

EO 13007 (*Indian Sacred Sites*) requires that to the extent practicable, Federal agencies accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and avoid adversely affecting the physical integrity of such sacred sites. EO 13175 (*Consultation and Coordination with Indian Tribal Governments*) requires that each Federal agency have an effective process to permit elected officials and other representatives of Indian tribal governments to provide meaningful and timely input in the development of regulatory policies on matters that significantly or uniquely affect their communities. As required by Army Regulations (AR) 200-4 and Department of Defense (DoD) Instructions 4715.3 and 4715.16, Fort Benning has implemented the Integrated Cultural Resources Management Plan (ICRMP) and an associated Historical Properties Component (HPC). Fort Benning uses the Army Alternate Procedures as detailed in the HPC of the ICRMP. These documents include descriptions of all known cultural resources at Fort Benning, how these resources will be managed, and who within Fort Benning is responsible for management of the resources. Standard operating procedures for the protection, preservation, and integration of resources are documented within the ICRMP and HPC. Strict adherence to the requirements of the ICRMP ensures compliance with all Federal, state, and local regulations. Consultation with the SHPO's and Federally-recognized Tribes is accomplished through the NEPA process and through twice yearly meetings with the GASHPO and Tribes. As part of the NEPA process, letters were sent to the Tribal representatives listed in Appendix A.

1.5.3.6 Socioeconomics and Environmental Justice

EO 12898 (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*) directs Federal agencies to assess the effects of their actions on minority and low-income populations within their region of influence. Agencies are encouraged to include demographic information related to race and income in their analysis of the environmental and economic effects associated with their actions.

1.5.3.7 Safety

Safety requirements at U.S. Army Installations are regulated under AR 385-10, *Army Safety Program* and implemented through DA Memo 385-3, *Headquarters Department of the Army (HQDA) Major Army Command (MACOM) Safety Program.* The purpose of the Army safety program is to protect Army personnel and minimize loss of Army resources from occupational deaths, injuries, or illnesses by managing risks. These standards ensure that all Army workplaces meet Federal safety and health requirements and apply to all Army activities, including those of the ARNG.

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2.0 DESCRIPTION OF THE PROPOSED ACTION

The ARNG undertook a master planning effort in 2007 to identify logical and sustainable development for the WTC at Camp Butler (GaARNG 2007). The master planning process, per guidance prescribed in AR 210-20, *Master Planning for Army Installations*, is designed to develop and integrate a wide range of operational and developmental plans to support the Installation's mission, provide direction for the continued development, operation, management, and maintenance of the Installation's resources, establish a framework whereby the Installation can manage its resources in compliance with all applicable laws and regulations, and be flexible in order to meet future mission needs as they arise. The master plan process is driven by the need to respond to current and projected mission requirements. These requirements were identified in response to existing and projected personnel (military, civilian, and student) numbers, training needs, and operational trends due to new and evolving missions.

The result of this master planning effort identified the need to establish a new CTC at Camp Butler's WTC. As part of establishing a CTC, new facilities would be constructed, some existing buildings renovated or demolished, utility infrastructure upgraded, and the existing obstacle course and physical fitness areas expanded and refurbished. The following criteria were applied in the WTC Master Plan design to maximize the ARNG's ability to construct these facilities on existing Camp Butler land and minimize impacts to meeting WTC training requirements:

- Retain existing facilities during construction to ensure continuation of the mission while maintaining high standards for training;
- Construct new facilities in a phased format in order to use existing facilities and meet budgetary constraints;
- Realign and relocate the existing obstacle course;
- Construct new buildings for administrative, instructional, billeting, dining, fitness, and support purposes;
- Create an enhanced pedestrian circulation system; and
- Build energy efficient facilities that achieve the Leadership in Energy and Environmental Design (LEED) Silver certification rating which assists in reducing green house gas emissions.

In total, approximately 15 acres (Figure 2-1) would be disturbed at the 42.7-acre Camp Butler site to accommodate establishing a new CTC. Table 2-1 identifies the facilities and infrastructure projects proposed for CTC development, size in square feet (sf), and type of activity to be undertaken at the facility. Additional infrastructure projects such as potable-, waste-, and storm-water systems as well as power and communication lines would either be upgraded or newly installed. To accommodate a change in mission requirements, some projects are currently underway or have been completed. These projects have been analyzed in separate NEPA documentation; as such, while these projects are not analyzed individually in this EA, they are included in the cumulative impacts analysis.

Table 2-1 Proposed WTC Construction at Camp Butler

Project Title	*Size (sf)*	*Facility Description*
Officer/Staff Barracks	25,674	New construction of sleeping quarters for 50, with 2 rooms at 250 sf each, sharing a latrine and closet, a lounge and laundry room for a total of 16,860 sf. The remaining space is occupied by walls or support of maintenance, custodial, interior mechanical, electrical, and communication functions. As part of this proposed action, the existing barracks located in Building 4156 would be demolished.
Troop Barracks	99,222	New construction for open bay billeting for 600 students. Facilities would include bays, common wash area, lounge, and laundry areas. Each bay would measure 90 sf for a total of 54,000 sf; the common wash area was figured at 10 sf per person for a total of 6,000 sf; a lounge based on 5 sf per student for a total of 3,000 sf; and a laundry area that was based on 144 sf per 40 students for a total of 2,160 sf. The rest of the square footage (34,062 sf) is set aside for maintenance, custodial, interior mechanical, electrical, and communication functions as well as the walls and circulation space. As part of this proposed action, the existing barracks located in Building 4156 would be demolished.
Dining Facility	3,309	The new dining area would be 2,400 sf; the remaining space includes walls and supports maintenance, custodial, interior mechanical, electrical, and communication functions.
Battalion Vehicle Shelter	14,400	One shelter would be newly constructed at 14,400 sf to protect Soldiers as they work on ARNG vehicles.
Training Device / Simulation Center	2,691	This new training area would comprise 1,840 sf. The remaining 851 sf includes walls and maintenance, custodial, interior mechanical, electrical, and communication functions.
General Instruction Buildings Base	12,287	The new building would be 8,400 sf. The remaining 3,887 sf[1] includes the walls and maintenance, custodial, interior mechanical, electrical, and communication support functions.
Paved Parking Areas	30,600	Construct new improved parking areas to support battalion headquarters and staff parking, medical clinic and fitness center parking, and government owned wheeled vehicle parking (30,600 sf). This project is currently underway.
Main Access Road	54,000	Flexible paving at 54,000 sf replacing Roselle Road. This project is currently underway.
Other Access Roads and Parking Areas	343,251	Flexible (i.e., asphalt) pavement supporting personally-owned vehicles parking at 283,500 sf and an access road at 59,751 sf.
Sidewalks	29,296	New sidewalks would be installed within the WTC complex (18,046 sf) and along the main entrance road (11,250 sf).
Headquarters, Supply / Administration, Physical Fitness Area	34,134	New headquarters at 5,196 sf; Company supply and administrative units at 2,980 sf per unit for 4 units for a total of 11,920 sf; a physical fitness area at 3810 sf; and a battalion supply/ration breakdown area at 2,409 sf. Maintenance, custodial, interior mechanical, electrical, communication functions, walls, and circulation for this two-story building comprise the remaining space. This project is currently underway.
Troop Medical Clinic	1,035	Medical Aid Station at 750 sf to include entrance, lobby, exam rooms, restrooms, offices, and storage space. Maintenance, custodial, interior mechanical, electrical, communication functions, walls, and circulation for this two-story building comprise the remaining 285 sf.
Gravel Roads	13,500	Fire access roads at 13,500 sf.
Building Demolition	N/A	Demolish Buildings 4155, 4156, and 4157.
Total Area of New CTC	663,399	(approximately 15 acres)

1-The square footages in this table reflect required, not authorized, space allotments; however, the physical fitness area was increased from the required 1,650 sf due to mission requirement changes.
Source: GaARNG 2009.

Figure 2-1 Proposed Action Development Site

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3.0 ALTERNATIVES CONSIDERED

3.1 OVERVIEW

NEPA and the implementing regulations indicate that an EA should identify and evaluate alternatives to the proposed action. The alternatives should provide a basis from which to compare the proposed action to other potential alternatives prior to implementing it. As discussed in Chapter 2, the ARNG undertook a master planning effort in 2007 that resulted in the evaluation of various site development alternatives. Through this planning effort, six alternatives were identified and evaluated for their ability to reasonably accomplish the primary mission of the WTC. The 2007 Master Plan effort that the ARNG completed was useful in developing the best set of options that would be meet the mission requirements as they became more specific and detailed so that appropriate NEPA analysis could be performed. The decisions in the Master Planning process considered location, size, and costs (GaARNG 2007). The outcome of the Master Planning process is condensed below. The screening criteria producing the alternatives considered including the preferred alternative is presented in Section 3.2.

During the master planning effort in 2007, the ARNG completed the following:

1. Analyzed the WTC mission/vision, existing conditions, organizational relationships, and functional adjacency requirements.

2. Integrated the analyzed data into fully articulated goals/objectives and principles that will guide the master planning process as it unfolds.

3. Established various conceptual development alternatives based on existing conditions, planning goals, facility needs, constraints, and opportunities that represent potential development scenarios that realistically address issues and identified visions.

4. Evaluated each alternative with respect to established WTC vision and goals and in the light of realistic budgetary considerations; identify a preferred Course of Action (COA).

5. Prepared a Site Development Plan that reflects a strategy that will provide programs and facilities, define land use and functional relationships that support the WTC mission and vision, and will be guided by goals and objectives defined earlier in the planning process.

In developing the alternatives, the ARNG identified requirements for the facility components. These requirements included such items as separation of classroom spaces, a centralized break area, the physical fitness facility being conveniently located to billeting with a dedicated track, a dining facility that can

accommodate 200 people and function as a multi-purpose area for ceremonies, and housing facilities that provide for a separation of ranks.

Six alternate site layouts were identified and categorized into one of three organization styles: traditional, clustered, or campus. In a traditional organization layout, most building shapes and sizes are modular with an established hierarchal layout. In a clustered organization, efficiency is of the highest importance as clusters are based on compatible uses. A campus organization is a combination of a traditional and clustered organizational style.

In the Master Plan, it was determined that a combination of alternatives 3 and 5 would best meet the mission requirements and was selected as the proposed action alternative. Under this alternative, the company's buildings are laid out in a radial pattern around the Headquarters building, which would remain as the focal point of the site. Staff and visitor parking would remain at the front of the Headquarters building, student parking would be relocated to the southeastern corner of the site, and green space would surround the Headquarters building. The obstacle course would be reconfigured to loop around a shared physical training pit in conjunction with a lighted running trail (GaARNG 2007). Refer to Table 2-1 for specific identification of the facilities and infrastructure projects proposed for CTC development under the preferred action alternative.

3.2 ALTERNATIVES DEVELOPMENT

3.2.1 Screening Criteria

The Master Plan used existing site conditions to help determine the suitability of the proposed CTC areas. Items evaluated included existing facilities; land use; environment (topography, hydrology, and species of concern [red-cockaded woodpecker]); viewshed; access, security, and traffic circulation; and infrastructure.

Since a change in mission requirements occurred since the Master Plan was released, this EA used additional screening criteria to determine whether other reasonable alternatives should be included in the environmental analysis. The screening criteria include (in priority order from most important criterion to least important criterion) the following:

1. **Location:** The proposed action must occur on previously disturbed land in close proximity to the WTC training area.

2. **Size:** The site needs to be approximately 15 acres to meet the facility size, setback and anti-terrorism/force protection requirements; provide adequate parking; and other requirements associated with the WTC mission.

3. **Infrastructure:** The site must minimize infrastructure improvements to the greatest extent possible.
4. **Security:** The site should comply with Force Protection criteria.

3.2.2 Preferred Alternative

The WTC provides specialized training opportunities. As such, the most important goal was to have the new CTC be located within close proximity to the existing training area/obstacle course to ensure a streamlined approach to meeting mission requirements. Almost as important is that the site be large enough to accommodate construction needed to meet mission requirements. All ARNG, Reserve Component, and Active Duty facilities in the area have been surveyed and none are available or can be expanded to meet these requirements (GaARNG 2009). Furthermore, since there are no plans to relocate the WTC to any other portion of Fort Benning or to any other Installation, the proposed new CTC must be located at the WTC. As such, it was determined that the WTC provides a unique environment and no other alternatives besides the No Action alternative were identified.

3.2.3 Comparison of Master Plan Preferred Course of Action and the Proposed Action (Preferred Alternative)

The site details for the proposed action described in this EA are a modification to the Master Plan's preferred COA. The modifications to the preferred COA occurred to accommodate mission changes and intervening project progress; as such, the specific layout of the buildings is a result of refined engineering. The overall footprint of the proposed CTC has not changed from the Master Plan and is consistent with the goals and objectives of the Master Plan.

3.3 No Action Alternative

Inclusion of the No Action alternative is prescribed by CEQ regulations that implement NEPA (40 CFR 1502.14[d]), whereby the No Action alternative must be included and analyzed to serve as a baseline against which environmental impacts of the preferred alternative is measured.

Under the No Action alternative, the ARNG proposed projects to establish a CTC would not be constructed and existing WTC facilities and operations would remain unchanged. Without implementation of the proposed action, the WTC would continue to operate in inadequate facilities with higher maintenance costs and possible interference of the WTC's ability to meet mission requirements.

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4.0 AFFECTED ENVIRONMENT

This section describes the existing environmental resources for Camp Butler. This information serves as a baseline from which to identify and evaluate environmental changes likely to result from implementing the proposed action. Baseline conditions represent existing 2009 conditions. The potential impacts of the proposed action and the No Action alternative are described in Section 5. In compliance with NEPA, CEQ guidelines, the Army NEPA regulations, and NGB NEPA guidance, the description of the affected environment focuses on those resources and conditions subject to impact if implementing the proposed action does occur. According to 40 CFR Part 1500.1(b) "…NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail" and 40 CFR Part 1500.4(b) "…prepar[e] analytic rather than encyclopedic [analysis]."

In total, 11 resources were evaluated for their potential to be affected by any of the elements associated with the proposed action. These elements are: construction (land clearing, demolition, and construction), operations (classroom instruction and combat training), and maintenance (building, landscape, and vehicle/equipment). Table 4-1 presents the results of the screening analysis to ensure the issues that are potentially impacted are evaluated in this EA.

Table 4-1 Resources Analyzed to Determine Further Evaluation

Resource Areas	Further Evaluation of Elements Required		
	Construction	*Operations*	*Maintenance*
Land Use (uses, aesthetics/visual resources, management, ownership)	Yes	No	Yes
Air Quality	Yes	No	No
Noise	Yes	No	No
Geology and Soils	Yes	Yes	Yes
Water Resources (hydrology, quality, floodplains, wetlands)	Yes	Yes	No
Biological Resources (wildlife, vegetation, sensitive species/habitat)	Yes	Yes	No
Cultural Resources (pre-historic and historic)	No	No	No
Socioeconomics (demographics, employment and economic activity, housing, schools, recreational facilities)	No	No	No
Environmental Justice (minority and low-income populations)	No	No	No
Infrastructure (utilities and transportation elements)	Yes	Yes	No
Hazardous and Toxic Materials/Waste (storage, handling, and disposal)	Yes	Yes	Yes

Legend:
Yes = resource would be potentially affected by an element associated with the proposed action;
No = resource would not potentially be affected by an element associated with the proposed action.

The following discussion is a summary of the resource areas not carried forward for further analysis because the potential for impacts has been considered to be negligible or nonexistent.

Air Quality. Air quality in a given location is described by the concentration of various pollutants in the atmosphere. The significance of the pollutant concentration is determined by comparing it to the applicable Federal and state ambient air quality standards. The Clean Air Act (CAA) and its subsequent amendments established the National Ambient Air Quality Standards (NAAQS) for six "criteria" pollutants: 1) ozone (O_3), 2) carbon monoxide (CO), 3) nitrogen dioxide (NO_2), 4) sulfur dioxide (SO_2), 5) particulate matter (PM) less than 10 and 2.5 microns (PM_{10} and $PM_{2.5}$), and 6) lead (Pb). These standards represent the maximum allowable atmospheric concentrations that may occur while ensuring protection of public health and welfare, with a reasonable margin of safety. The WTC is located in the Columbus (Georgia)-Phenix City (Alabama) Interstate Quality Control Region (defined in 40 CFR Part 81.58) that is in attainment (e.g., meets the standards) for all criteria pollutants.

Local and regional air quality would not be affected by the proposed action for the following reasons: 1) only about 15 acres of land would be disturbed over a 3-year period and temporarily produce large-particulate matter (PM_{10}) in the form of dust by land disturbing activities; construction equipment emissions would not degrade regional air quality; 2) emissions over the next 5 years from tactical, government-owned, and privately-owned vehicles would not introduce significant new mobile source emissions to the region since these vehicles would be relocated from one location within Fort Benning to another (Camp Butler); and 3) there would continue to be minor short and long-term fugitive dust emissions from training activities, but these emissions would not significantly impact air quality. All applicable Federal and State air quality protection requirements will be implemented. Because these WTC activities would constitute only minor changes to existing emissions levels and local and regional air quality would not be degraded, further analysis of air quality is not required and has been eliminated from further consideration in this EA.

Noise. Under the proposed action, noise would be generated from construction and operational activities (and to a very minor degree by maintenance activities). Noise from construction equipment would be buffered by vegetation, be localized, and fall within Camp Butler. Construction would occur over a 3-year period and during daylight hours; therefore, there would be little chance for night-time noise disturbances. In addition, WTC construction would be separated from any residential areas by several miles and have no impact to sensitive receptors such as schools, cemeteries, or homes. Construction noise could disturb wildlife, but it is anticipated that wildlife would move and only be affected on a short-term, temporary basis. Operationally, training would continue in the similar manner and amount as is found under existing conditions; the ARNG training activities within Camp Butler and Fort Benning ranges are accounted for in the Army's Integrated Operational Noise Management Plan and managed accordingly. Because construction noise would be short term, and no new noise sources would be created in the long term operationally, it is concluded that there would be no noise impacts. As such, this resource is not carried forward for more detailed analysis.

Cultural Resources. The proposed action would not impact cultural resources as cultural resource surveys have been conducted and no known archeological, architectural, or traditional cultural resources were identified (Fort Benning 2008). Fort Benning has prepared a Memorandum For the Record (MFR) that documents that the closest cultural or archaeological site to the project area is approximately 0.38 miles. This MFR is included as Appendix B to this EA. If any unknown archaeological materials are discovered during construction activities, construction would cease, NGB and Fort Benning Cultural Resource Managers would immediately be notified, and no construction would take place until the materials are evaluated and their eligibility to the National Register of Historic Places (NRHP) assessed. If such materials were determined to be eligible to the NRHP, they would be avoided or mitigated in accordance with Section 106 of the National Historic Preservation Act (NHPA). Therefore, this resource has not been carried forward for detailed analysis in this EA. Standard operating procedures for protection of cultural resources are documented in Fort Benning's ICRMP. A brief description of the ICRMP can be found in Section 1.5.3.5.

In addition, as stated in Section 1.5.3.5, consultation with the SHPO's and Federally-recognized Tribes is accomplished through the NEPA process and through twice yearly meetings with the GASHPO and Tribes. As part of the NEPA process, letters were sent to the 11 Tribal representatives listed in Appendix A.

Socioeconomics. Implementation of the proposed action would not affect socioeconomic resources. The proposed action would not change the regional population demographics as there would be no increase in WTC permanent personnel and the students would be transient. Economically, the small scale of the proposed construction expenditures would not result in noticeable regional direct or indirect effects, especially when considered in conjunction with the ongoing personnel increases and construction activities associated with the Army Base Closure and Realignment Commission (BRAC) 2005 and Transformation Actions (Fort Benning 2007) and Maneuver Center of Excellence (MCoE) Actions (Fort Benning 2009d) at Fort Benning. No new housing would be required; there would be no school-aged children; and recreational facilities would be accommodated as part of the proposed action; therefore, it is anticipated that there would be no communities exposed to adverse socioeconomic impacts. As such, this resource is not carried forward for further analysis.

Environmental Justice. Implementation of the proposed action would comply fully with Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice in Minority and Low-income Populations*, and EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. The proposed action would occur entirely within the boundaries of Camp Butler, within the larger Fort Benning military reservation. There are no minority or low-income populations adjacent to or near Camp Butler and, therefore, they would not be disproportionately impacted. Being an active military training site, there are neither schools nor children in the vicinity of the WTC, so they would not be affected by the proposed action. In summary, no environmental justice issues would occur under the proposed action and this resource is not carried forward for more detailed analysis.

4.1 LOCATION DESCRIPTION

The ARNG WTC is located at Camp Butler adjacent to Fort Benning's Harmony Church Cantonment area in Chattahoochee County, west-central Georgia (see Figure 1-1). Training in support of the WTC occurs both within Camp Butler at the physical training, obstacle course, and rappel tower (see Figure 1-2) and in existing Fort Benning ranges. The surrounding landscape is primarily wooded forests with a few rolling hills. The WTC is situated on a plateau surrounded by steep slopes and mature tree cover. The annual average precipitation for the area is 48.57 inches. Rainfall is fairly evenly distributed throughout the year, with the wettest month being March with an average rainfall of 5.75 inches. July is the warmest month of the year, averaging about a 91 degrees Fahrenheit (ºF) high and a 72 ºF low. January is the coldest, averaging about a 57ºF high and 37ºF low. The developed area of the WTC Complex currently covers approximately 17 acres of generally flat terrain. The WTC annex area (with rappel tower and obstacle course) is about 20 acres in size. The remaining area includes on-going WTC expansion (refer to Figure 1-2) and open space.

4.2 LAND USE

Camp Butler is the training site and headquarters for the ARNG WTC and is located entirely within Fort Benning, a military reservation set aside for Army training since 1918. Land use and management within the cantonment areas of Fort Benning is conducted in accordance with *AR 210-20, Real Property Master Planning for Army Installations*, dated May 16, 2005. The Real Property Master Plan for Fort Benning dates from 1994; while it provides a basis for orderly development of the Installation, the planning has largely been overcome by the events surrounding the unforeseen scale of recent development at Fort Benning. Much of the planning in recent years has been collaborative and conducted in accordance with the guidelines of AR 210-20. Fort Benning's annual planning board addresses ongoing Real Property Management Planning by considering and prioritizing projects for future years.

The primary land use on Camp Butler is in support of classroom instruction and combat readiness. The current training mission involves the use of classroom, billeting, and medical facilities; a headquarters' administrative building; physical training field and obstacle course; and parking for government and privately-owned vehicles. As shown in Figure 4-1, the WTC at Camp Butler consists of approximately 42.7 acres and supports five functional areas: administration and support, education and billeting, training, parking and circulation, and open space (GaARNG 2007; USACE 2009).

Administration and Support. Command, Control, and Operations functions are found in Building 4155. This function is responsible for management of day-to-day WTC activities and is adjacent to the education and billeting functions (GaARNG 2007).

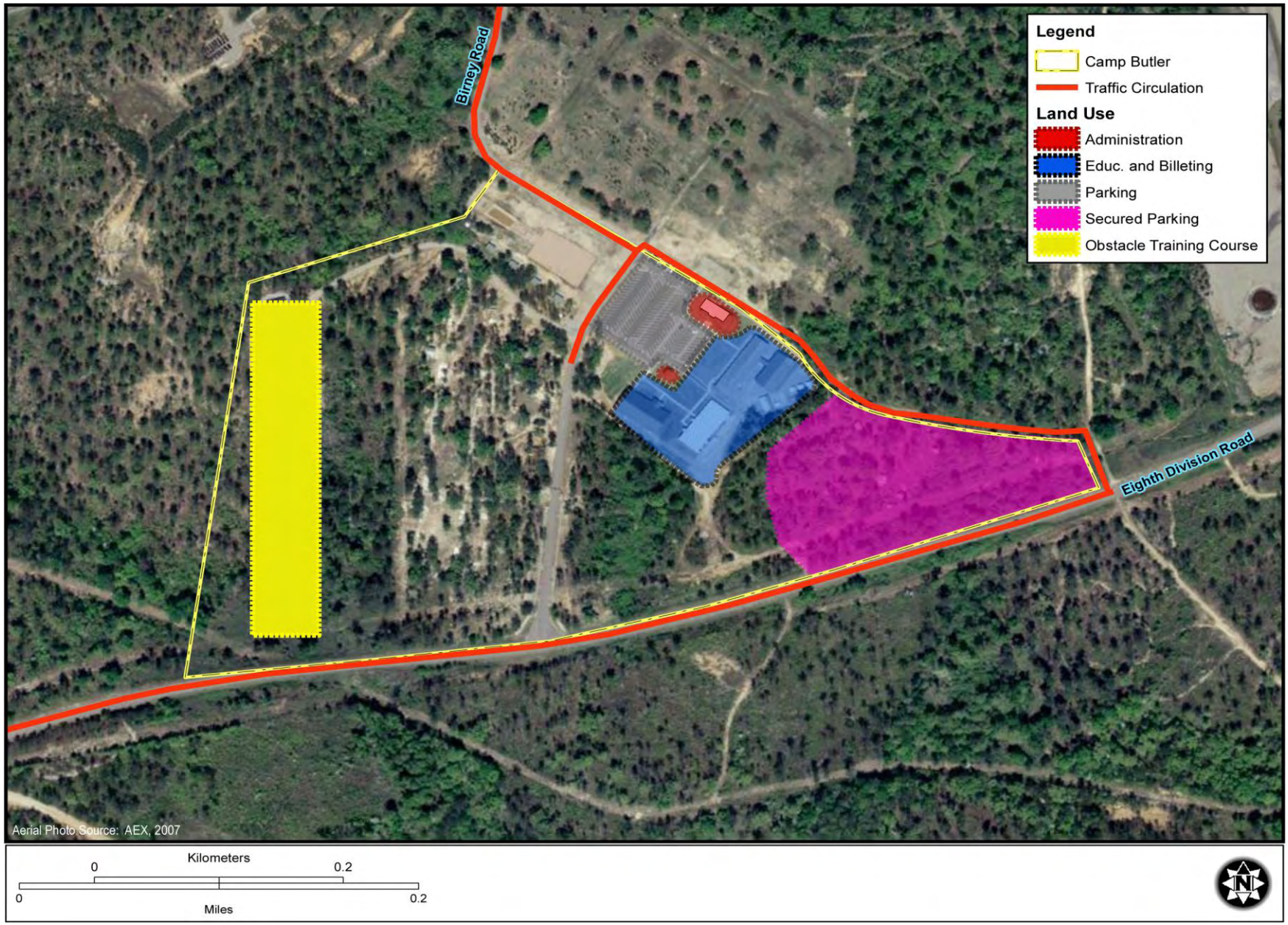

Figure 4-1 ARNG WTC Existing Land Uses

Education and Billeting. Classrooms are located in buildings 4157, 4153, 4159. Open bay billeting, latrines and laundry rooms are located in buildings 4156, 4160, and 4161. These facilities include open bay barracks and large classrooms; Building 4156 houses latrines and wash facilities (GaARNG 2007).

Training. The majority of the official WTC training areas are located in the north and western portions of the property. These areas include the rappel tower, obstacle course, physical training, and the mission preparation area (GaARNG 2007).

Parking and Circulation.. Parking and traffic circulation account for approximately 7 acres of Camp Butler. This includes long-term student parking and access from Eighth Division Road and along Birney Road. There is no unpaved or satellite parking at or near Camp Butler available due to BRAC construction at Fort Benning. (GaARNG 2007).

Open Space. Open space comprises approximately 12 acres of undeveloped or unpaved areas between Camp Butler and Eighth Division Road (GaARNG 2007). Demolition of the southern section of Roselle Road has temporarily disturbed a small portion of the open space. Construction of a long-term student parking area where the Birney Road extension intersects Eighth Division Road has converted approximately 2.5 acres of open space to parking.

Adjacent land uses are set aside to support Fort Benning's military mission which includes light and heavy infantry (mounted and dismounted) training and the soon to be established Armor School training. The Armor School's mission is to provide basic combat training to Soldiers and Marines in tank and fighting vehicle operation, weapons system deployment, and armor vehicle maintenance. Armor crewmen (tankers) work as part of a team to operate armored equipment and fire weapons to destroy enemy targets. Tanks would use mobility, firepower, and shock effect to engage enemy forces (Fort Benning 2009d).

4.3 GEOLOGY AND SOILS

Geological resources of an area consist of the surface topography, surface soil, subsurface soil, bedrock materials, and the inherent properties associated with each. Soils are typically described according to their complex types and physical characteristics. Geological factors that influence an area's stability include topography and soil properties. Regional and site-specific geomorphic conditions and the general geological setting of an area are intrinsic properties used in describing an area's geology. Topography is the change in vertical relief (elevation) over the surface of an area. It is generally the product of natural influences such as erosion, seismic activity, climatic conditions, and the underlying geologic materials, but can be influenced by human activity.

A discussion of topography typically includes a description of surface elevation, slope, and distinct physiographic features (e.g., mountains, ravines, and depressions) and their influence on human activities. The topography across Camp Butler is variable with the WTC Complex located on a plateau between two small draws. The majority of the site has steeper upland slopes and elevations range from about 375 to 450 ft above mean sea level (GaARNG 2007).

Geologically, the WTC is located south of the Fall Line, which is defined by the overlap of Coastal Plain strata on top of Piedmont rocks. Along the Fall Line Sandhills, crystalline rocks of the Piedmont are overlain by marine or fluvial sediments, resulting in varied topography. The sedimentary sequences of the Coastal Plain that overlie the crystalline basement rocks consist of materials deposited during the Cretaceous, Tertiary, and Quaternary Periods. The Cretaceous Period sediments form the uplands and consist of the five following geologic formations (Fort Benning 2001). Table 4-2 provides a general description of each of these formations.

Table 4-2 Geologic Formation Descriptions

Geologic Formation	General Description
Ripley Formation	Fine to very fine, calcareous quartz sand, massive burrowed to bioturbated, greenish-gray, weathers to dusky yellow, contains abundant muscovite, glauconite, and locally abundant carbonaceous debris; local clean quartz sand lenses. Ledge-forming, carbonate-cemented sand beds and calcareous concretions are common in upper part of unit. Thickness ranges from 133 to 250 ft. The Ripley Formation is found only along the southeastern boundary of Fort Benning. This area is also where the highest elevations on the Installation are found.
Cusseta Sand	Medium to coarse quartz sand, pale yellow to light olive gray, thinly bedded to laminated clay, medium olive-gray to brownish-black, and micaceous fine sand, light olive-gray. Formation thickness ranges from 150 to 233 ft.
Blufftown Formation	Fine sand to sandy clay, calcareous, glauconitic, and micaceous, light brownish-gray to olive-gray, interfingers with medium to coarse sand, quartzose, pale yellow. Locally abundant carbonaceous debris, shell beds, and calcareous concretions. Formation thickness ranges from 200 to 433 ft.
Eutaw Formation	Fine to very coarse sand, very pale orange to yellow, and clay, brownish -gray. Thickness of the unit ranges from 100 to 280 ft.
Tuscaloosa Formation	Fine to very coarse sand, pale yellowish-green to pale orange, crossbedded, quartzose and containing abundant potassium feldspar, interbedded with massive sandy clay, pale olive to reddish-brown, locally mottled. Gravelly and poorly bedded deposits at base difficult to distinguish from residuum on underlying crystalline rocks. Thickness ranges from 165 to 500 ft.

Source: Fort Benning 2001.

Camp Butler is located entirely within the Lakeland Troup soil association. This sandy soil is well drained, but considered highly erodible (USACHPPM 2005a). Prime farmland soils are protected under

the Farmland Protection Policy Act of 1981. There are no Prime farmland soils within Camp Butler. As a result, this factor will not be evaluated further in this document.

4.4 WATER RESOURCES

Watersheds include surface and below-ground water resources such as marshes, lakes, rivers, streams, floodplains, and groundwater. The Clean Water Act of 1977, the Safe Drinking Water Act of 1972 and Amendments of 1986, and the Water Quality Act of 1987 are the primary Federal laws that protect these waters. Pursuant to these overarching Federal laws, several state and local regulations and permit requirements protect the quantity and quality of water resources.

The WTC is located within the Chattahoochee River Basin (USGS 2006), Hydrologic Unit Code 0313003, in Fort Benning's Watershed Management Unit 23. In terms of surface water, most of the WTC Complex drains eastward to a culvert that directs surface water out of the compound and into a forested area just south of Eighth Division Road. Camp Butler drains to two ephemeral streams of Harps Creek (Figure 4-2); about a half mile downstream these tributaries join the perennial flow of Harps Creek. Harps Creek then meanders about 5 miles through mostly wetland areas before discharging into Oswichee Creek. Oswichee Creek then travels through about 4 miles of floodplains to discharge into the Chattahoochee River (USACHPPM 2005b).

Non-point source pollutants including sediment, nutrients, bacteria, organic matter, metals, hydrocarbons, pesticides, and trash/debris pollution are the most significant sources of water quality degradation in Georgia's waters (Center for Watershed Protection 2009). Rivers, streams, and marshes are impacted by industrial and municipal discharges; agricultural runoff; sewer overflows and septic system failures; urban and highway stormwater runoff; waste disposal; and sediments. Lakes are primarily impacted by nonpoint sources including septic systems, stormwater runoff, and soil erosion. Georgia Environmental Protection Division has designated the Chattahoochee River as an "impaired stream" due to fecal coliform and urban runoff.

Stormwater runoff is precipitation that falls onto impervious surfaces such as roofs, streets, parking lots, and sidewalks and is not absorbed or retained by that surface. Rather, the runoff flows off these surfaces, gaining volume and energy, and can affect water quality by depositing sediment, minerals, or contaminants into surface water bodies.

Wetlands serve as the transition between terrestrial habitats and aquatic habitats and are defined by the U.S. Army Corps of Engineers (USACE) as areas which are characterized by a prevalence of vegetation adapted to saturated soil conditions (USACE 1987). Wetlands can be associated with groundwater or surface water and are identified based on specific soil, hydrology, and vegetation criteria defined by USACE.

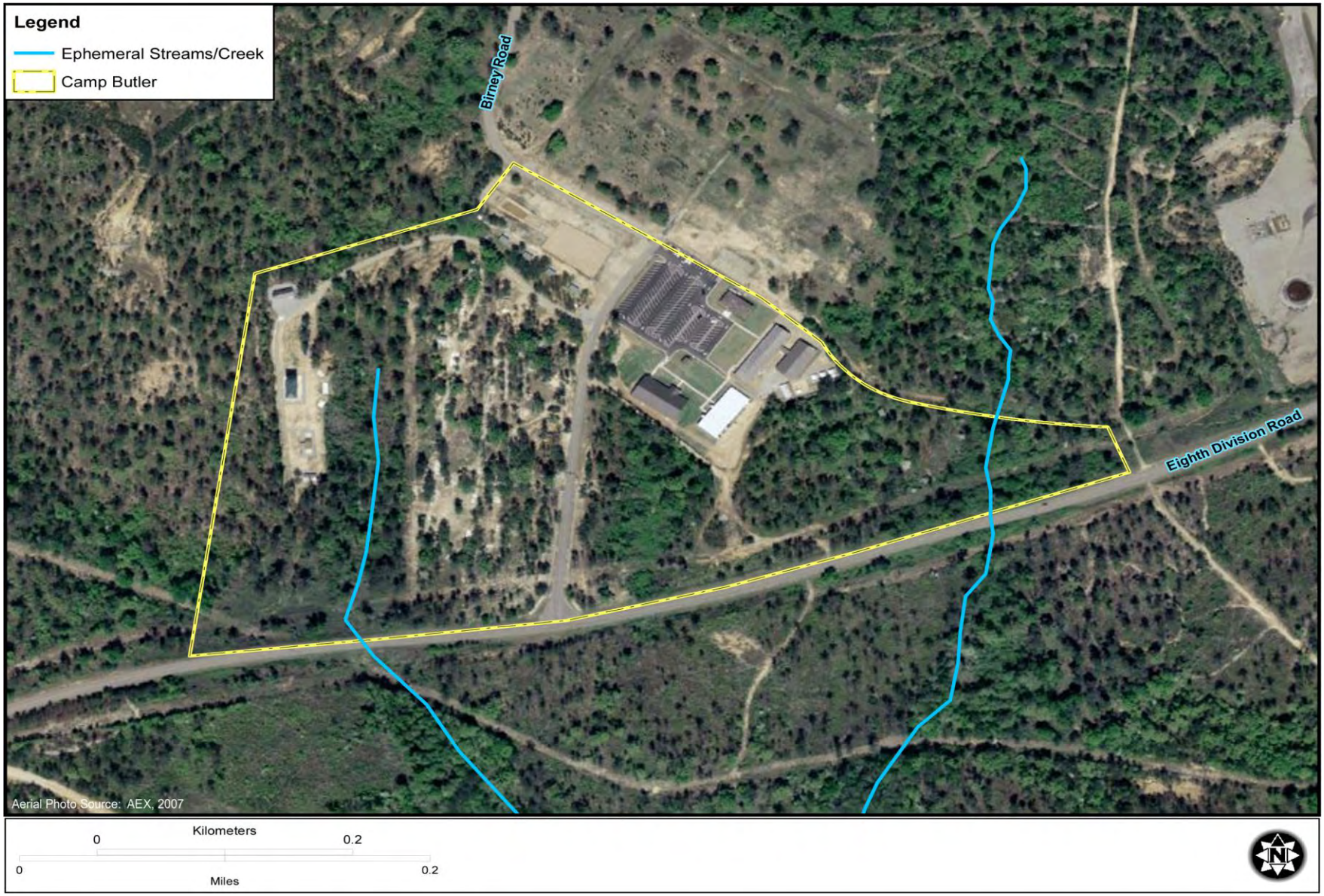

Figure 4-2 Surface Water in the Vicinity of Camp Butler

The National Wetlands Inventory (NWI) conducted by the U.S. Fish and Wildlife Service (USFWS) shows that there are no wetlands on or within the proposed WTC development area. The closest wetland areas in the vicinity of the WTC development area are two small (approximately 0.1 and less than 0.1 acres) wetland areas approximately 0.11 miles to the southeast and southwest of the proposed project area.

Floodplains typically are described as areas likely to be inundated by a particular flood. The WTC does not lie within a 100- or 500-year floodplain (FEMA 1988).

Groundwater refers to subsurface hydrologic resources that may be used for domestic, agricultural, and industrial purposes and often is stored in natural geological formations called aquifers. The WTC is found in the Coastal Plain hydrologic province of Georgia, whose principal ground water source is the Cretaceous aquifer system. Ground water in this area can be encountered within 8 feet of the ground surface; levels and flow tend to mimic the topography by flowing from hilltops and ridges toward streams. The recharge area for the deeper aquifers lies principally along the fall line, northwest of Fort Benning, but also includes the Sand Hills Area within Fort Benning (USACHPPM 2005a). The general groundwater flow direction where Camp Butler is located is to the southeast (Fort Benning 2004). During the 2005 Phase II Environmental Baseline Study (EBS), only one (TWP-01) of eight proposed temporary well points was installed near the drainage culvert at the Pre-Ranger Complex. This well point was the only well point to produce water. Water from this well point was produced from a perched aquifer located in a sandy layer approximately 8 to 11 feet below ground surface. No volatile organic compounds, semi-volatile organic compounds, or metals (arsenic, cadmium, chromium, or lead) were detected in the ground-water samples collected from TWP-01 (USACHPPM 2005b).

Water service is provided by Columbus Water Works. According to the 2009 Water Quality Report for Columbus and Fort Benning, the drinking water supplied by Columbus Water Works has met or exceeded all EPA and state drinking water standards (Columbus Water Works 2010).

4.5 BIOLOGICAL RESOURCES

Biological resources include native and naturalized plants and animals and the habitats in which they occur. The dominant plant species make up plant communities, which in turn define the vegetation of an area. Habitat is defined as the area or environment where the resources and conditions are present that cause or allow a plant or animal to live there. Biological resources addressed in this EA include vegetation, wildlife (including birds and fish), and special status species. The affected environment includes areas within Camp Butler and the immediate vicinity.

Vegetation includes all existing terrestrial plant communities in areas potentially subject to ground disturbance. Within Fort Benning, the Army has classified terrestrial plant and animal community

habitats into seven ecological groups (Fort Benning 2001, 2003). Ecological groups are the top level of a hierarchy that includes a finer scale of differentiation, vegetation alliances, and associations that are structurally and functionally similar. These classification groups provide a framework for managing species and habitats of concern. As shown in Figure 4-3, Camp Butler includes three ecological groups: Longleaf Pine Sandhills, Plantations, and Other Altered Areas. These groups and a brief description of each is provided below.

Longleaf Pine Sandhills are characterized by relatively open stands of longleaf pine, frequently with an understory of scrub oak, on sandy soils. Longleaf pine maintains stronger dominance here than in the loamhills; loblolly and shortleaf pine are less able to compete successfully in the deep sandy and dry soils. Scrub oaks that are a common component of these stands include bluejack (*Quercus incana*), sand post oak (*Quercus margarettiae*), and turkey oak (*Quercus laevis*). Sassafras, farkleberry, and hawthorn (*Crataegus* spp.) are common shrub species. Grasses and legumes are diverse and common in the ground layer (Fort Benning 2007). Despite stronger longleaf pine dominance, the Sandhills stands are generally less dense overall than the Loamhills stands. Because of lower fuel conditions on average as compared with the loamhills, the natural fire return interval is longer in the sandhills.

Plantations represent forested habitat that has been substantially modified by forest management, urban development, military training, or other human activity. Reforested longleaf pine plantations, established habitat for the Federally-listed red-cockaded woodpecker (RCW) (*Picoides borealis)*, are predominant at Camp Butler in the training area to the west and to the east, along Eighth Division Road.

Other Altered Areas include shrub and grassy areas that are a result of military construction, training, and maintenance activities. Camp Butler supports several grassy areas where parking and training occurs.

Wildlife includes both bird and fish species and their habitat. Except for resident game birds, most of the birds on Camp Butler are protected under the Migratory Bird Treaty Act (MBTA). This Act implements various treaties and conventions between the US and Canada, Japan, Mexico, and the former Soviet Union for the protection of migratory birds. Conservation of migratory birds by Federal agencies and their consideration in the NEPA process is also mandated by EO 13186. On July 31, 2006, a Memorandum of Understanding (MOU) was finalized between the Department of Defense and USFWS which identified measures to enhance migratory bird conservation on U.S. military Installations. Consistent with this MOU, the ARNG manages and conserves migratory bird species through implementing management prescriptions in the Fort Benning Integrated Natural Resources Management Plan (INRMP). The ARNG will continue to follow the applicable MOU provisions, which may involve permitting for some activities, and further consideration of migratory bird management in the INRMP.

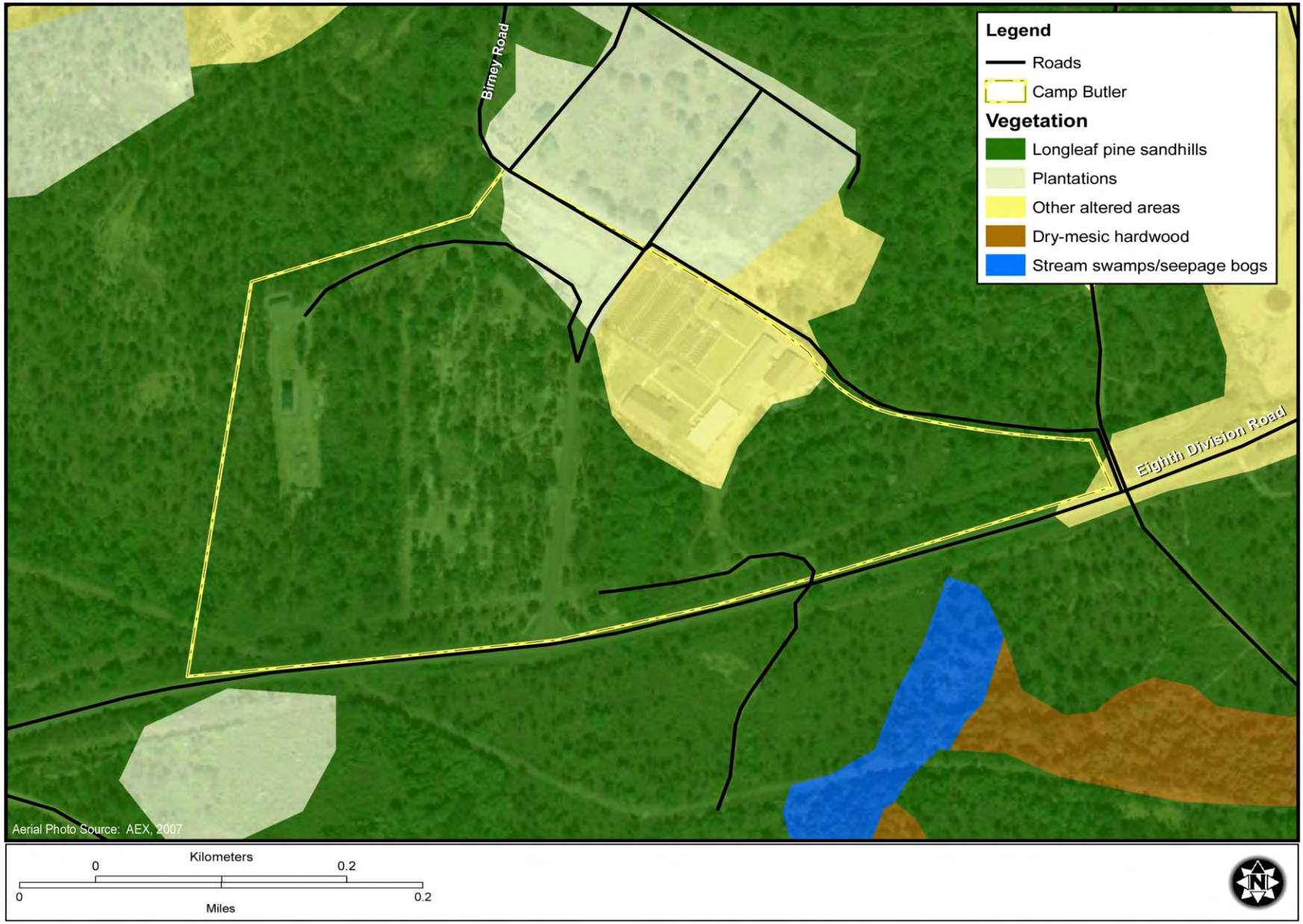

Figure 4-3 Ecological Groups on Camp Butler

On Fort Benning, there are approximately 150 bird species (found either seasonally or year round) protected under the MBTA and 16 species considered Species of Concern (SOC) based on Partners in Flight (PIF) and Landbird Population Estimates (LPE). Each of these species has been assigned a PIF score. Under the PIF Assessment Process, scores are assigned to each species based on vulnerability factors. These include: Relative Abundance, Breeding Distribution, Non-breeding Distribution, Threats to Breeding, Threats to Non-breeding Distribution, and Population Trend (Fort Benning 2003).

A higher PIF score indicates greater need for conservation attention directed towards the SOC within the region. Similarly, SOC with higher PIF priorities receive precedence in guiding conservation efforts. According to the PIF LPE database, populations of the migratory bird SOC, with the exception of the red-cockaded woodpecker (RCW), are plentiful within the Bird Conservation Region where Camp Butler is located.

Wildlife also includes all amphibian, reptile, and mammal species (except those identified as special status species). While Fort Benning supports at least 350 invertebrate, fish, and mammal species such as alligators, turtles, water snakes, beaver, white-tailed deer (*Odocoileus virginiana*), feral swine (*Sus scrofa*), wild turkey (*Meleagris gallopavo*), gray squirrel (*Sciurus carolinensis*), raccoon (*Procyon lotor*), rabbits (*Sylvilagus* spp.), and other small mammals, very few of these are likely to be observed in the Camp Butler site due to its largely developed and disturbed nature.

Special-status species include those listed as threatened, endangered, or proposed as such by the USFWS or the State of Georgia, and other species of conservation concern. The Endangered Species Act (ESA) protects Federally-listed threatened and endangered plant and animal species. State-listed species are not protected under the ESA; however, the ARNG coordinates with Fort Benning and cooperates with sister state authorities to conserve these species. Other species of concern are also managed and include state species of special concern, rare species, unusual species, or a watch-list species. The State-listed species could be considered for Federal listing in the future and are afforded special management attention by ARNG. Within the affected environment, the only special-status species potentially impacted by the proposed action is the RCW.

RCWs have a social structure that involve a breeding pair and helpers that assist with cavity excavation and maintenance, egg incubation, feeding young, and defending the group's territory. Nesting generally occurs from April through June. Groups of RCWs nest in an aggregation of cavity trees called a cluster that is surrounded by contiguous foraging habitat. Discrete cluster sites are typically located where mature pine trees are more than 60 years old. Foraging habitat, however, is more variable with timber taking on increasing value as the stands age past 30 years. Both nesting and foraging habitat can be characterized as open

stands of pine with a scarce to moderate midstory. As the midstory becomes dense or reaches the height of cavities, cluster abandonment and decreased foraging value results.

While Fort Benning supports one of the larger RCW populations in the southeastern United States and has been designated as a primary recovery populations, only foraging habitat for one cluster (HCC-11R) is found within Camp Butler's boundaries (Figure 4-4). A Foraging Habitat Analysis (FHA) was conducted in conjunction with the Army's implementation of BRAC and Transformation actions (Fort Benning 2007). As part of the BRAC and Transformation actions, three projects were completed in this area. These include the Trainee Barracks Complex Borrow Pit Area (FY07; PN64370), IET Brigade Headquarters Building (FY07; PN65056), and road improvements (FY08; PN65439). In their August 2007 Biological Opinion, the USFWS determined the HCC-11R cluster would be negatively impacted due to the loss of foraging habitat. Although an incidental take was received for the loss of foraging habitat to this cluster, the cluster still exists and is managed according to Army RCW Guidelines.

4.6 INFRASTRUCTURE

This section describes utilities and transportation elements associated with the built environment of Camp Butler that would interact with the proposed construction projects. All utilities are commercially or municipally provided. The majority of infrastructure at Camp Butler was installed in the early 1940s and upgraded over the years to meet changing demands (GaARNG 2007).

Both the potable and waste water systems at Camp Butler are provided by Columbus Water Works (CWW), which owns and operates the systems on Fort Benning (USACHPPM 2005b). Newer, high-capacity piping has recently been installed to service both current and anticipated demand on Camp Butler. Georgia Power supplies electrical power to Camp Butler; the voltage is transformed, metered, and fed to the Flint Energies-owned Marne Road substation on Fort Benning to Camp Butler. Within Camp Butler, power is primarily distributed by overhead lines (USACHPPM 2008), but these lines are being buried as funding and development occurs. Fiber communication lines, with capacity to support the requirements of the WTC, currently exist on site (GaARNG 2007).

Camp Butler sanitary waste is transported to a state-permitted transfer station in Salem, Alabama by a licensed waste management contractor. The waste is transferred to a landfill operated by Waste Management with a capacity of 10 million tons over the next 75 years of its lifespan (Fort Benning 2007). Recycling reduces disposal cost, conserves natural resources, and minimizes environmental problems associated with land disposal.

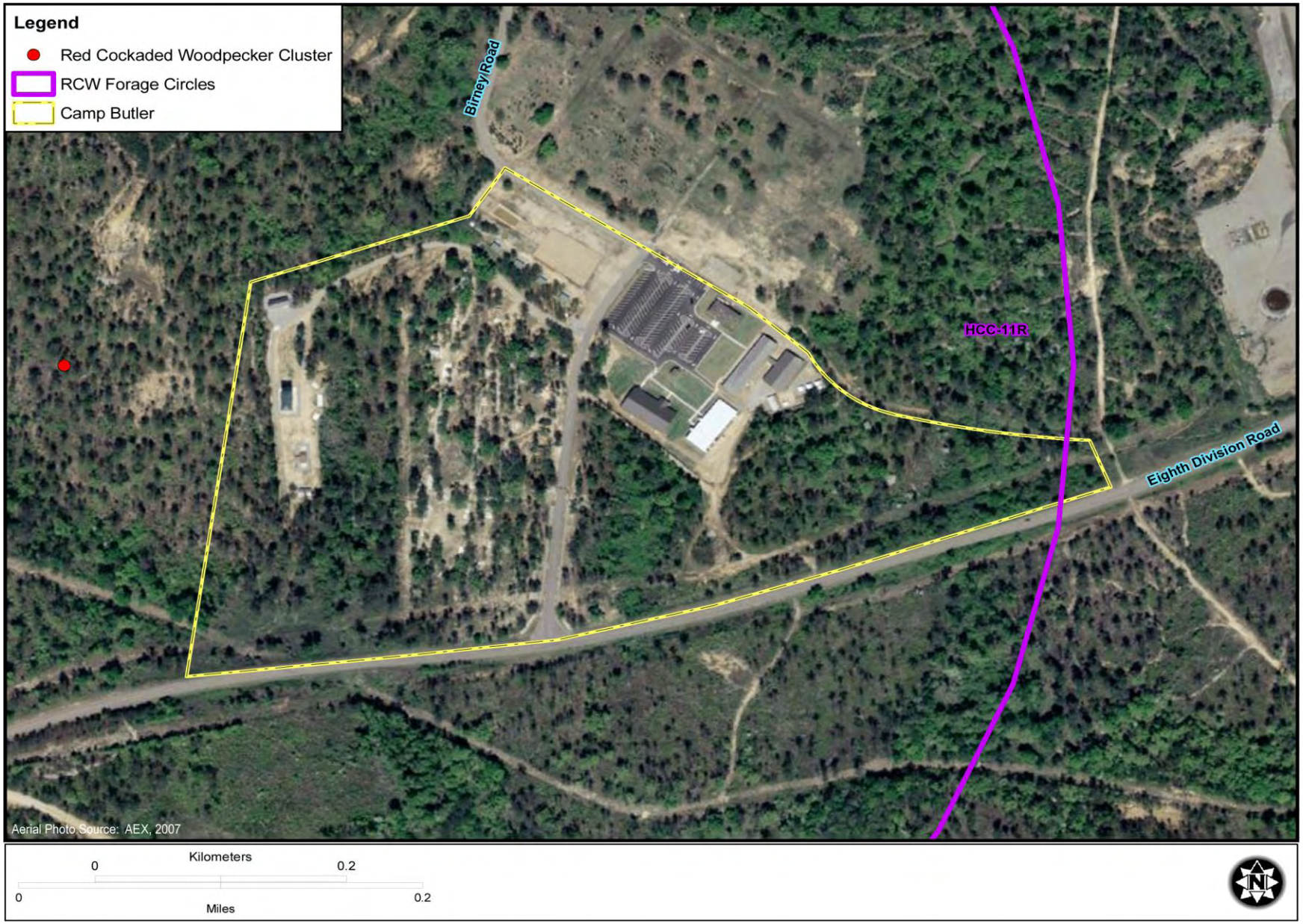

Figure 4-4 Threatened and Endangered Species in the Vicinity of Camp Butler

The ARNG's policy on recycling is guided by the DoD Pollution Prevention instruction, the "Qualified Recycling Program" (DoD 1996) and EO 13101, *Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition*, dated 14 September 1998 (DoD 1996). Under these policies, NGB personnel and contractors are required to actively participate in the recycling program, and all of the proceeds from the program are retained by the Installation. The Material Recycling Program at Fort Benning has restarted (as of November 16, 2009) and allows Camp Butler to recycle paper, aluminum, plastic, and wood products. Recyclable materials are taken to Fort Benning's Defense Reutilization Marketing Service and the Materials Recovery Facility for processing (Fort Benning 2007).

Primary roadways providing access to Camp Butler are Interstate 185 and U.S. Highway 27/280. The nearest access point to the WTC is found on Fort Benning at U.S. Highway 27/280 and First Division Road. Once on Post, First Division and Eighth Division Roads provide access via Birney Road. Parking at Camp Butler is limited with existing hardened/paved space located adjacent to Building 4155 and long-term student parking at the intersection of Eighth Division and Birney Roads (refer to Figure 1-2).

4.7 HAZARDOUS AND TOXIC MATERIALS/WASTES

Hazardous materials and waste are identified and regulated under the Comprehensive Environmental Response, Compensation, and Liability Act; the Occupational Safety and Health Act; the Resource Conservation and Recovery Act (RCRA); the Federal Insecticide, Fungicide, and Rodenticide Act; and the Emergency Planning and Community Right-to-Know Act. The Clean Water Act also addresses hazardous materials and waste through Spill Prevention, Control, and Countermeasure (SPCC) and NPDES requirements. Hazardous materials have been defined to include any substance with special characteristics that could harm people, plants, or animals when released. Various state laws also regulate the management and disposal of hazardous materials and waste.

Hazardous waste is defined in the RCRA as any "solid, liquid, contained gaseous or semisolid waste, or any combination of wastes that could or do pose a substantial hazard to human health or the environment." Waste may be classified as hazardous because of its toxicity, reactivity, ignitibility, or corrosivity. In addition, certain types of waste are "listed" or identified as hazardous in 40 CFR 263.

Hazardous material storage and usage is limited at the WTC. Hazardous materials include weapons cleaning parts washer detergent as well as motor gasoline and diesel fuel. Fuel, gas, and oil are stored in the grounds-keeping shed for lawn equipment, all terrain vehicles, and utility terrain vehicles. Fluid top off is conducted on site for vehicles; however, maintenance is conducted off-site by a vendor (Smith 2009). The parts washer waste and cleaning rags are stored at the WTC and tested for appropriate disposal; these wastes are turned in to Fort Benning and disposed under contract. There is one, 500-gallon above-ground storage tank containing propane gas behind Building 4155 (USACHPPM 2005a).

Past resource and waste management practices at DoD facilities have resulted in the presence of toxic and hazardous waste contamination at some Installations, including Camp Butler. As a result of the potential lease of Camp Butler property to the ARNG, an updated EBS was performed in March 2005 (USACHPPM 2005a). This Phase 1 EBS determined that due to the potential release of contaminants from past storage and use of the chemical products that Phase 2 testing was warranted with the results presented below. There are several adjacent Solid Waste Management Units outside Camp Butler boundaries; however, according to the 2006 Environmental Baseline Study (EBS) Addendum, all of these units are closed and require no further action (USACHPPM 2006).

In a follow-on Phase II survey of the area, soils were found to have elevated levels of arsenic that exceed the USEPA's Region 3 arsenic Risk-Based concentrations for industrial soils although elevated arsenic levels were found in the background samples as well as the site test locations (USACHPPM 2005b). The elevated arsenic may have been the result of naturally occurring conditions or past application of pesticides in the area (USACHPPM 2005b). However in 2006, a subsequent risk assessment determined that levels would not pose a health risk for future use of the site (USACHPPM 2006).

Low concentrations of petroleum hydrocarbons, cadmium, chromium, and lead were observed in several soil samples including background locations. The Phase 2 report stated that the low concentrations are not a likely threat to human health or the environment through direct contact with the soil (USACHPPM 2005b).

In terms of toxic materials, no surveys for asbestos-containing materials, polychlorinated biphenyls, or lead based paint have been conducted at Camp Butler. As stated in Section 1.2, the WTC is composed of eight buildings: Buildings, 4153, 4155, 4156, 4157, 4158, 4159, 4160, and 4160. Under the proposed action, Buildings 4155, 4156, and 4157 would be demolished. Building 4155 was constructed in 1986; Building 4156, a double-wide trailer, was moved to the site sometime after 1982; and Building 4157 was constructed in 1989 (USACHPPM 2005a). The 2005 EBS concluded that asbestos-containing materials, polychlorinated biphenyls, or lead based paint are not likely to occur since the buildings were constructed after 1978 (USACHPPM 2005a).

In summary, there are only negligible quantities of fuels (e.g., heating oil, gasoline, or diesel); petroleum, oil, and lubricant [POL]) products; and other hazardous or toxic materials or wastes used, stored, and or disposed of at the ARNG WTC.

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5.0 ENVIRONMENTAL CONSEQUENCES

This section forms the scientific and analytical basis for the comparison of the proposed action and the No Action alternative. It identifies the direct, indirect, and cumulative effects of the proposed action and the No Action alternative on each of the resource areas previously described in the affected environment section. Both beneficial and adverse effects are described. If no effects are identified for a particular resource area, that fact is mentioned. Direct and indirect effects are not necessarily separated in the analysis, but they are considered. Effects are also discussed in terms of their duration, where appropriate. Short-term effects are those that would occur primarily during the construction period. Long-term effects are those that would continue for an undetermined period after the completion of the construction projects. Measures planned to mitigate adverse effects, as well as, cumulative effects are addressed in separate sections, rather than under each resource area.

5.1 LAND USE

Evaluating the environmental consequences of the proposed and No Action alternatives on land use involves consideration of the effects of those actions on the natural and human modified conditions and of the affected environment. Existing land uses within Camp Butler and the WTC are primarily developed/institutional with forested and open space set aside for training. Impacts to land use would be considered significant if they result in the following:

- Are incompatible with surrounding land uses;
- Change land uses in such a way that mission-essential training is degraded; and/or
- Are inconsistent or conflict with the environmental goals, objectives, or guidelines of a community or county comprehensive plan for the affected area.

5.1.1 Effects of the Proposed Action

Under the proposed action alternative, land would be disturbed to support the new CTC at the WTC Complex. As noted in Table 2-1, some projects at the WTC have been evaluated under separate NEPA documentation and qualified for Categorical Exclusions. Categorical exclusions are actions defined in the Army NEPA regulation that would not result in significant impacts either individually or cumulatively. If the proposed action were implemented, the new CTC would be compatible with adjacent land uses. This conclusion is supported by the fact that Camp Butler (a military training entity) is collocated within Fort Benning (another military training Installation), and their similar military use is complimentary and compatible. While land use in the northern portion of Camp Butler would change from training in open areas to education and billeting, this change would not be considered significant since the mission would not be degraded but in fact enhanced due to improved facilities and their location. None of the activities proposed with the new CTC would conflict or be inconsistent with environmental goals or conflict with

any community or county comprehensive plans. The ARNG would ensure that Fort Benning environmental goals are maintained and consistent with Army planning efforts (this is due to the fact that the WTC is a tenant on this land and leases it from the Army); the proposed action would not conflict with any community or county comprehensive plans because it is totally located within an Army Installation. Training would continue on lands already set aside for such activities so no adverse impacts would be incurred to land use due to ongoing training or expansion and refurbishment of the obstacle course and physical fitness areas. No off-post land uses would be impacted. Therefore, no adverse impacts are expected to land use from the proposed action alternative.

5.1.2 Effects of the No Action Alternative

Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.

5.2 GEOLOGY AND SOILS

Impacts of the proposed action to geology and soils would be considered significant if they would result in an increase of surface water runoff or wind- or water-induced soil erosion such that air or water quality regulatory thresholds were exceeded and/or stream use classifications degraded.

Under the proposed action alternative, construction (e.g., facilities and infrastructure, parking, roads, lay down areas for construction equipment), demolition, landscaping, fencing, and trenching for underground utility installation and/or upgrades would disturb about 15 acres. Additionally, the existing physical fitness areas and obstacle course would be reconfigured, but no new soil disturbance would occur. Construction and demolition activities could result in the temporary migration of airborne or waterborne soil particles and POLs from equipment.

To prevent soil erosion, damage to endangered species habitat, or sedimentation of streams and wetland areas, the ARNG employs Best Management Practices (BMPs) as defined by the Georgia Department Natural Resources (GDNR), Georgia Soil and Water Conservation Commission recommendations, and the Georgia Manual of Erosion and Sediment Control (GASWCC 2002). Georgia environmental regulations require an approved Erosion Sedimentation Pollution Control Plan (ESPCP), fees, and Notice of Intent to meet the Federal National Pollutant Discharge Elimination System (NPDES) and state water pollution control requirements. The ARNG also considers and complies with soil conservation measures in their planning and execution for all construction, operation, and maintenance activities involving land disturbance. The ESPCP will prescribe activities to limit erosion and sedimentation from the site and includes a site description, list of BMPs to be used, BMP inspection procedures to be performed by qualified personnel, procedures for timely BMP maintenance, requirements for sampling of discharges or receiving streams for turbidity, and reporting requirements to requisite state agencies.

Construction contractors must install erosion control measures and implement practices to prevent erosion and to retain the sediment typically generated by the land-disturbing activities within the boundaries of the construction site as per GA EPD NPDES Construction Permit GAR 100003 and Fort Benning DPW Environmental Management Division (EMD). They must also plant or otherwise provide a permanent ground cover sufficient to restrain erosion after completion of construction to satisfy the 100 percent coverage under the NPDES Construction Permit GAR 100003. Further, in accordance with the WTC Erosion and Sediment Pollution Control Plan (ESPCP), any disturbed area left exposed for a period greater than 14 days must be stabilized with mulch or temporary seeding. Contractors are also responsible for developing the ESPCP and obtaining approval, coordinating with the DPW EMD, NPDES Program Manager for submittal of fees, ESPCP, and notice of intent to Georgia environmental regulatory agencies prior to any land disturbances.

5.2.1 Effects of the Proposed Action

Clearing, grading, and construction would have minor, short-term adverse impacts to soil cover and stability. However, the use of soil erosion control BMPs during and after construction would minimize potential impacts from erosion and runoff. Adherence to Federal and State erosion and spill regulations, laws, and permit requirements would minimize off-site impacts. In addition, no impacts are anticipated to the local geology. Assuming that all Georgia and Federal regulations, laws, and permit requirements are followed, the activities associated with implementation of the proposed action should have no adverse impacts to the soil resources at Camp Butler.

5.2.2 Effects of the No Action Alternative

Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.

5.3 WATER RESOURCES

Water resources found within Camp Butler include groundwater, and two ephemeral stream tributaries to Harps Creek. Stormwater runoff flows down drainage ditches and through culverts to eventually join tributaries of the Chattahoochee River. No wetlands or floodplains are found within the WTC proposed development area and were not carried forward into this analysis. Impacts to existing water resources would be considered significant if they introduce a measurable amount of sediments into Harps Creek or its associated wetlands whose waters eventually flow into the Chattahoochee River (a State-designated impaired waterway).

5.3.1 Effects of the Proposed Action

Effects to water resources from the proposed action could result from erosion and runoff. Stormwater impacts would be minimized through application of practices prescribed in the Army Low Impact Development (LID) strategy. The goal of LID is to maintain or restore the natural hydrologic functions of a site to achieve natural resource protection objectives and fulfill environmental regulatory requirements. LID employs a variety of natural and built features that reduce the runoff rate, filter out its pollutants, and facilitate the infiltration of water into the ground. By reducing water pollution and increasing groundwater recharge, LID helps to improve the quality of receiving surface waters and stabilizes the flow rates of nearby streams (DoD 2004). The proposed detention tank and oil-water separator should contain runoff from the parking lot once construction is completed. Therefore, it is not anticipated that groundwater would be affected by the proposed action.

The proposed construction and demolition activities could temporarily increase localized erosion rates. BMP's implemented as required by the GDNR NPDES Construction Permit and other Federal and State regulations and permitting requirements should minimize sedimentation into the ephemeral tributaries during construction. Adherence to the ESPCP and implementation of the Georgia stream buffer variance requirement would also minimize the possibility of construction equipment going inside stream buffer areas. With the implementation of LID and BMPs, sedimentation into Harps Creek would be minimized and potential effects are not likely to become significant as no water quality regulatory thresholds (i.e. turbidity) are expected to be exceeded, nor will impacts affect GA stream antidegredation policy or current stream use designations.

After construction is complete, impervious surfaces would increase surface water flows. However, the new detention tank and oil-water separator should be capable of handling runoffs and restricting contamination flows into the Chattahoochee River Basin.

In summary, LID and BMPs would be used to minimize adverse, short-term impacts due to demolition and construction activities. Long-term impacts due to training, operations, and maintenance activities would be minor, assuming that the ARNG would adhere to all Federal and State laws, regulations and permit requirements protecting water quality.

5.3.2 Effects of the No Action Alternative

Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.

5.4 BIOLOGICAL RESOURCES

Impacts on biological resources would be considered significant if one or more of the following conditions would result:

- Substantial loss or degradation of habitat or ecosystem functions (natural features and processes) essential to the persistence of native plant and animal populations;
- Substantial loss or degradation of a sensitive habitat that support high concentrations of special status species;
- Disruption of a Federally-listed species, including its normal behavior patterns or its habitat, that substantially impedes the Installation's ability to either avoid jeopardy or conserve and recover the species; or
- Substantial loss of population or habitat for a state-protected or non-listed but special status species, increasing the likelihood of Federal listing action to protect the species in the future.

5.4.1 Effects of the Proposed Action

There are no waters on Camp Butler to support aquatic flora or fauna; therefore, there would be no adverse impacts to these resources. Under the proposed action only deadwood and underbrush will be removed limiting any impact to native plant and fauna habitats. Short-term, minor adverse impacts are expected to wildlife disturbed during construction activities. No state-listed species are located within with project area; therefore, no adverse impacts are anticipated. The ARNG manages and conserves migratory bird species through implementing management prescriptions in the Fort Benning INRMP and will continue to follow the applicable MOU provisions discussed in Section 4.5. It is anticipated that implementing the proposed action would not result in adverse effects to the migratory bird population.

As stated in Section 4.5, one RCW cluster, HCC-11R, is located within the 0.5 mile radius of the proposed action area. Three projects were completed in this area in conjunction with implementation of BRAC/Transformation actions. These projects include the Trainee Barracks Complex Borrow Pit Area (2007), IET Brigade Headquarters Building (2007), and road improvements (2008). In their August 2007 Biological Opinion, the USFWS determined the HCC-11R cluster would be negatively impacted due to the loss of foraging habitat. Although an incidental take was received for the loss of foraging habitat to this cluster, the cluster still exists and is managed according to Army RCW Guidelines. Direct and indirect impacts to the cluster would not result from the proposed construction activities. In addition, since there would only be the removal of deadwood and underbrush, no vegetation supporting foraging habitat would be removed. In accordance with the RCW Demographic Monitoring Plan developed for the BRAC/Transformation actions (expanded to include those clusters affected by MCoE projects [USFWS 2009]), Fort Benning will monitor all clusters with cavity trees experiencing habitat loss from within their

foraging partitions as a result of any project. If unexpected or detrimental impacts are noted during a monitoring event, consultation with the USFWS would be conducted.

In summary, no adverse impacts are expected to aquatic flora and fauna, state-listed and Federally-listed species. The proposed action would result in minor, short-term adverse affects to wildlife. Use of soil erosion BMPs would protect vegetation, water quality, and habitat and would minimize the potential for any long-term, adverse impacts.

5.4.2 Effects of the No Action Alternative

Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.

5.5 INFRASTRUCTURE

Infrastructure at the WTC Complex includes all utilities and transportation elements on and leading to Camp Butler. Impacts would be considered significant if they:

- Exceed the current capacity of one or more utility supplies (either input or output); or
- Exceed the capacity of one or more transportation elements.

5.5.1 Effects of the Proposed Action

Under the proposed action, utility systems (power, electric, sewer, and potable/waste water) would need to be connected to new CTC facilities from the existing systems. Detailed electrical engineering designs have not been performed, nor have specific demands been determined; however, the increases in building footprints would increase the demand for additional electricity. This increase demand is not expected to overload the current power generation supplied by Flint Energy; therefore, the proposed action would not result in any impacts to electricity provision.

The WTC complex currently supports 142 permanents positions and 6,500 students were cycled through in 2009. No increase in staff or student population is expected. No increases in potable water consumption, wastewater generation, or solid waste generation is expected under the proposed action. As such, no short- or long-term adverse impacts on these utilities would occur.

Solid waste generated during construction and demolition activities would be disposed of by the construction contractor(s) at approved off-post landfills. The average C&D construction debris generation rate is 4.34 pounds per sf for nonresidential structures and 4.51 pounds per sf for residential structures (such as the barracks) (EPA 2005). Approximately 25 to 35 percent of C&D debris is recycled

(EPA 2005). Using a conservative approach, it was assumed that only 25 percent of C&D debris would be recycled. Refer to Table 5-1 for the C&D construction and demolition debris estimates for the proposed action.

Table 5-1 Solid Waste Generation for the Proposed Action

Action	*Size (sf)*	*Solid Waste Generation Rate (lbs per sf)*[1]	*Total Solid Waste Generated (lbs)*	*Total Solid Waste Disposed (lbs)*	*Total Solid Waste Disposed (tons)*
Officer/Staff Barracks	25,674	4.51	115,790	86,842	43
Troop Barracks	99,222	4.51	447,491	335,618	168
Dining Facility	3,309	4.34	14,361	10,771	5
Battalion Vehicle Shelter	14,400	4.34	62,496	46,872	23
Training Device / Simulation Center	2,691	4.34	11,679	8,759	4
General Instruction Buildings Base	12,287	4.34	53,326	39,994	20
Other Access Roads and Parking Areas	343,251	N/A[2]	0	0	0
Sidewalks	29,296	N/A[2]	0	0	0
Physical Fitness Area	3,810	4.34	148,142	111,106	56
Troop Medical Clinic	1,035	4.34	4,492	3,369	2
Gravel Roads	13,500	N/A[2]	0	0	0
Totals			**726,170**	**544,627**	**272**

[1]-Based on EPA (2005) estimates

[2]-Estimates not available for road construction

The regional landfills have adequate capacity to accommodate this one time increased demands from construction and demolition. As such, no short- or long-term adverse impacts to solid waste or recycling capabilities are anticipated under the proposed action.

A portion of Roselle Road (refer to Figure 2-1) has been eliminated by a separate action and replaced by a peripheral road that runs north of Camp Butler and connects with Birney Street. This road improvement increased the overall safety of Camp Butler and its students by restricting all personal vehicles and

deliveries to outside of WTC facilities and away from PT, obstacle course, and rappel tower training areas. Additionally, new access roads would improve traffic flow around Camp Butler. Construction may result in temporary delays and create alternate traffic patterns along First and Eighth Division Roads; however, because these impacts would be temporary and occur over multiple years, only short-term, minor adverse impacts are anticipated to transportation and traffic flow due to construction. Once the new WTC Complex is completed, transportation and traffic flow would experience long-term, beneficial impacts with new roads and parking areas.

In summary, the proposed action would adversely impact infrastructure resources on a short term, minor basis. Over the long term, it is anticipated that, with the exception of transportation (which would experience positive impacts), no other adverse impacts would occur to infrastructure resources.

5.5.2 Effects of the No Action Alternative

Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged. However, parking would remain limited and access to the WTC would continue to be compromised under the No Action alternative. Therefore, the No Action alternative could incur long-term, adverse impacts to transportation and traffic flow.

5.6 HAZARDOUS AND TOXIC MATERIALS/WASTES

Federal, State, and local laws regulate the use, storage, disposal, and transportation of hazardous materials and wastes. These laws have been established to protect human health and the environment from potential impacts. Impacts of the proposed action or the No Action alternative would be considered significant if they present a substantial risk of release of hazardous materials/wastes that could ultimately reach water resources and those risks could not be effectively reduced through preventive and reactive measures.

5.6.1 Effects of the Proposed Action

In the short term, the quantity of hazardous materials such as POLs, delivered to and used on Camp Butler would increase in support of the construction activities. Quantities of various fuels in excess of current operating demand would be required for construction activities due to the use of mobile-power generators and heavy equipment. All hazardous materials brought to Camp Butler would be required to be stored in appropriate, ventilated, and spill-protected structures located on asphalt or an equivalent impervious surface. Volatile materials would be maintained in closed containers. The acquisition of environmentally preferable products, including raw materials and manufactured items and their packaging, would be considered for inclusion in contract clauses for the construction projects. Contractors would be responsible for disposing of construction hazardous wastes in landfills that can accept such wastes. In

summary, it is anticipated that if the proposed action were implemented there would not be any short-term, adverse impacts from construction to hazardous material storage and handling.

Over the long term, hazardous materials would be generated at a slightly increased level due to training and operations. Materials would be managed and stored in accordance with all applicable Federal, state, and DoD regulations and permit requirements. The risk of uncontrolled release of hazardous substances would be minimized through the use of industry accepted methods and by following applicable Federal and state laws and regulations, as well as DoD policies for fuel storage (e.g., double-walled aboveground storage tanks equipped with leak detection systems) and other hazardous materials (e.g., self-contained storage cabinets with appropriate flammability ratings). Potential spills from the secondary containment structures associated with any above ground storage tanks or spills in uncontained areas would be contained by using absorbent materials, portable booms, or other barriers. Absorbent materials and spill kits are currently maintained in sufficient quantities at existing oil handling and storage facilities. Therefore, the proposed action would not present any long-term, adverse impacts to hazardous material storage and handling.

It is expected that during construction and demolition activities, there would be periodic increases in the quantity of hazardous waste generated and shipped off site for disposal. Specifically, demolition debris and contaminated soils which exhibit any of the characteristics of hazardous waste would be managed as hazardous waste in accordance with applicable Federal, state, local, and DoD regulations. Therefore, it is anticipated that there would be no short-term, adverse impacts due to these wastes during construction. Once the CTC is completed, adherence to existing material and waste management plan and procedures for handling, storage, and disposal of these substances would preclude any long-term, adverse impacts.

With regard to toxic substances, several materials would be prohibited from use in construction projects, including those containing asbestos, urea formaldehyde, polychlorinated biphenyls, chlorinated fluorocarbons, and lead (e.g., as a component of finishing products such as rust-proofing and interior/exterior paints and coatings). The material prohibitions would be stated in contract clauses and design specifications developed by NGB, other authorized contracting agencies, and selected contractors. While toxic substances (e.g., asbestos-containing building materials, lead-based paint, and polychlorinated biphenyls) are not suspected in or on existing structures, if they are identified during project implementation they would be characterized, packaged for transportation off-post, and disposed of in accordance with relevant Federal, state, and local regulations before any demolition activities would occur. Compliance with applicable regulations would be stipulated in contract documents when any or all aspects of the identification, removal, packaging, transportation, and disposal would be managed by a contractor or contractors. Overall, no short or long term adverse impacts to toxic substances are anticipated.

Pesticides would be used during construction activities. As a tenant on Fort Benning Property, the ARNG is subject to the provisions and requirements of DoDI 4150.07, *DoD Pest Management Program*, and the installation's Integrated Pest Management Plan. Per the requirements found in DoDI 4150.07, soil treatment for termite prevention would be conducted in accordance with Unified Facilities Guide Specifications 31 31 16, *Soil Treatment for Subterranean Termite Control*. Any pesticides needed during construction activities would be applied as needed in accordance with applicable Federal and state regulations.

5.6.2 Effects of the No Action Alternative

Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.

5.7 MITIGATION MEASURES

This section presents the mitigation plans for the proposed action. CEQ regulations recognize five types of mitigation measures; in order of desirability, they include avoiding, minimizing, rectifying, reducing, and compensating. While there are no significant adverse impacts that need to be mitigated under the proposed action, it was determined that minimization of minor adverse impacts would be required for impacts to soil, water, and biological resources. No other resource impacts present minor adverse impacts.

5.7.1 Minimization Measures for Soil Resources

In summary, under the proposed action the required soil resource minimization measures include:

- Application of Federal and State erosion control and NPDES requirements, including BMPs would minimize impacts during construction.
- Continued adherence to Federal and state laws and regulations and management plans would minimize impacts due to training, operations, and maintenance activities in the long term.

5.7.2 Minimization Measures for Water Resources

Minimization measures for water resources include:

- Application of LID and soil erosion BMPs would minimize sedimentation into adjacent waterways during construction.
- Continued adherence to Federal and state laws and regulations and management plans would minimize impacts due to training, operations, and maintenance activities in the long term.

5.7.3 Minimization Measures for Biological Resources

Minimization measures for biological resources include:

- Use of BMPs for soil erosion prevention to protect vegetation, water quality, and habitat.

5.8 CUMULATIVE EFFECTS

This section discusses the relevant anticipated cumulative effects of the proposed action and its alternative on those resources affected when considering other actions in the area. The CEQ defines cumulative effects as the "impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions."

The ARNG WTC is located at Camp Butler adjacent to Fort Benning's Harmony Church cantonment area in Chattahoochee County; the surrounding landscape is primarily wooded forests with a few rolling hills. As discussed in Chapter 2, approximately 15 acres would be disturbed at the 42.7-acre Camp Butler site. Impacts to air quality, noise, cultural resources, socioeconomics, and environmental justice were not analyzed as the potential for impacts to these resources were considered to be negligible or nonexistent. As such, there will be no cumulative impacts to these resources and they are not discussed in further detail. Unless otherwise noted, the region of influence (ROI) for the cumulative impacts analysis includes Camp Butler and its adjacent Harmony Church cantonment area.

5.8.1 Current Projects and Activities

As part of the BRAC/Transformation actions, the Army would provide the facilities, infrastructure, and equipment needed to support the Transformation activities at Fort Benning. Various construction activities including the construction of administrative, supply/storage, maintenance, barracks, commercial services, community facilities, medical and dental, and recreation facilities would occur at Fort Benning's four cantonment areas: Main Post, Kelley Hill, Sand Hill, and Harmony Church area. Additional projects associated with the Maneuver Center of Excellence (MCoE) also occur in the Harmony Church area. Specific to this EA, the following provides a list and description of actions that are proposed for the Harmony Church area near the WTC action area:

- Several Barracks Complexes: Construction of a Basic Combat Training complex and a vehicle maintenance instructional and general instruction building. The Basic Combat training Complex would include an open-bay billeting space, five company operations, classroom space, covered training areas, battalion headquarters, a dining facility, equipment storage building, and a running track. No existing buildings will be demolished as part of this effort. These barracks complexes

were analyzed in the BRAC EIS. Trainee Barracks, Complex 1 construction is completed. Trainee Barracks, Complex 3 construction is partially complete. These areas are approximately 0.15 miles from the WTC project area.

- Road Improvements: Construction of a new interchange at U.S. Highway 27/280 at Cusseta Road, as well as improvements at the existing First Division Road interchange at the northwestern corner of the Harmony Church area. Improvements would include a visitor control center, entry control points, and traffic control devices. The new interchange at Cusseta Road was analyzed in the MCoE EIS. This project is in design and is located approximately 0.5 miles from the proposed WTC project development area.
- 16th Cavalry Regimental Headquarters Building Complex: Construction of a new Instructional Space facility to include an auditorium/classroom, laboratory instruction space, and automation-aided instructional space. The 16th Calvary Headquarters Complex was analyzed in the BRAC EIS. Construction is partially complete. This project is approximately 0.5 miles from the WTC project area.
- Training Support Brigade Complexes: Construction of a Training Support Brigade complex. Facilities would include barracks, brigade and battalion headquarters, company operations facilities, dining facilities, working animal building, general purpose storage, vehicle maintenance shop, oil storage buildings, organizational vehicle parking and sentry buildings. The Training Support Brigade Complexes were analyzed in the BRAC EIS. Construction is partially complete with the exception of the Brigade Headquarters which is complete. These complexes range from 0.45 to 0.9 miles away from the WTC project area.
- Material Recycling Facility, Ammunition Storage, Fire Station and Anti-Terrorism/Force Protection: Multiple projects under this project number including the construction of a replacement material recycling facility if needed based on proposed road improvements in the Harmony Church area, an ammunition storage facility, a fire station, and anti-terrorism/force protection improvements. The recycling facility and fire station/anti-terrorism/force protection improvements are in planning and design. The ammunition storage facility is partially complete. These project areas range from 0.8 to 2.0 miles away from the WTC project area.
- Vehicle Maintenance Facility: Construction of a vehicle maintenance instructional and general instruction building to include concrete apron and tactical vehicle hardstand. This facility was analyzed in the BRAC EIS. Construction is partially complete. This project is approximately 0.7 miles away from the WTC project area.
- Simulations Training Facility: Proposes the renovation and expansion of Building 5500, Collins Training Center, to a Maneuver Center Simulation Facility. The Unit Maintenance Activity Facility was analyzed in the BRAC EIS. Construction is partially complete. One portion of this facility is immediately north and adjacent to the WTC project area, and a second portion of this Simulations Training Facility is approximately 0.5 miles south of the proposed WTC project area.
- Centralized Wash Facility with Soaking Capabilities: Construction of an organizational vehicle wash facility to include pump houses, water recycle and distribution system, combination control

booth/latrine building, heavy vehicle baths, vehicle final wash area, vehicle staging area hardstand, pumps and controls, grit and oil chambers, filter area including service roadway, detention pond, concrete tank trail road to facility, and tactical vehicle hardstand. This facility was analyzed in the BRAC EIS. Construction is partially complete. This project is approximately 0.7 miles from the proposed project area.

- Drivers Training Area: Construction of a variety of paved and unpaved driving courses with terrain variations and slopes, road crossovers, observation tower, lighting, maintenance building, hardstand, and standard small range operations area for tracked vehicle drivers training course. This training area was analyzed in the BRAC EIS. Construction is partially complete. This project is approximately 1.25 miles from the proposed WTC project area.
- Vehicle Recovery Area: An area to train soldiers on how to retrieve tracked vehicles when mired and/or overturned. This includes maintaining the towing equipment (brakes, hydraulics, and winches), towing techniques, and driving the tow vehicles while towing the tracked vehicles. The Vehicle Recovery Area was analyzed in the MCoE EIS. Construction is partially complete. This project is approximately 0.6 miles away from the proposed WTC development area.
- Troop Store: Construct an Army and Air Force Exchange Service Military Clothing and Sales Store to support the MCoE increased need for retail shopping in the Harmony Church area. The Troop Store was analyzed in the MCoE EIS. Planning and design is in progress. This project is approximately 0.6 miles away from the proposed WTC development area.
- Direct Support/General Support (DS/GS) Vehicle Maintenance Facility: Provide vehicle maintenance shop, covered storage, vehicle paint and prep shop, oil storage building, hazardous materials storage, an electronics/weapons repair shop, compact item repair shop, covered wash area, vehicle fueling facilities, and engine/transmission test building. This DS/GS maintenance facility was analyzed in the BRAC EIS in a Kelly Hill location and was re-analyzed in the MCoE EIS in a Harmony Church location. Construction is partially complete. This project is approximately one mile from the proposed WTC project development area.
- Harmony Church Chapel: Standard Army design 400-seat chapel. This chapel was analyzed in the BRAC EIS. Planning and design is in progress. This project is approximately 0.5 miles from the proposed WTC development area.
- Equipment Concentration Site (ECS): Construct an ECS consisting of a new maintenance facility and warehouse building along with extensions of utilities to necessary service. This ECS was analyzed in the BRAC EIS. Construction is partially complete. This project is approximately one mile from the proposed WTC project development area.
- Army Reserve Center (ARC): Construct an ARC Organizational Maintenance Shop and unheated storage building. The ARC was analyzed in the BRAC EIS. Planning and design in progress. This project is approximately one mile from the proposed WTC project development area.
- Troop Medical Clinic: Proposes to construct an addition/alteration to the Consolidated Troop Medical Clinic. Primary facilities include the medical clinic addition and alteration. The Troop

Medical Clinic was analyzed in the BRAC EIS. Construction partially complete. This project is approximately 0.5 miles from the proposed WTC development area.

- Shop 1 Maintenance Facility: This maintenance facility in Harmony Church is partially complete. It is located approximately one mile from the proposed WTC project development area.
- Brigade Headquarters Complex: This project includes a brigade headquarters complex, administrative building and parade grounds. This project construction has been completed. This project is approximately 0.4 miles from the proposed WTC project development area.
- Training Support Brigade Complex: This complex is part 2 of a two phase development project that included barracks, brigade and company headquarters, dining space, and technical library as well as storage and maintenance facilities. Construction for this project is partially complete. The location of this project is approximately 0.5 to 0.9 miles away from the proposed WTC project development area.

In addition to the BRAC/Transformation actions, the following actions have been completed within the Harmony Church area after separate NEPA documentation:

- Flexible (i.e., asphalt) pavement supporting personally-owned vehicles parking at 283,500 sf and an access road at 59,751 sf.
- Flexible paving at 54,000 sf replacing Roselle Road.

Potential environmental impacts from these actions were analyzed in the October Final EIS for BRAC 2005 and Transformation Actions (Fort Benning 2007). Implementation of alternative B in the BRAC EIS, the preferred alternative, would result in potential significant impacts to vegetation, wildlife, and special-status species habitat. The impacts to Federally-listed species were addressed in the Biological Assessment (BA) prepared for the BRAC 2005 and Transformation Actions (Fort Benning 2007b). There would be potential moderate adverse impacts to transportation during morning and peak hours, and no significant adverse impacts to land use, utilities, hazardous materials and toxic waste, soils (as long as soil erosion control BMPs are implemented), or water resources.

5.8.2 Potential Future Projects and Actions

As part of the MCoE Actions, the Army would construct, operate, and maintain additional facilities and training areas (including ranges and maneuver areas) to accommodate the consolidated Armor and Infantry mission of the MCoE and the increased military personnel and students due to Army Growth. The following future construction projects are proposed for the Harmony Church area and are in the planning and design phase:

- Road Improvements: Construction of 26.56 miles of concrete surfaced and 6.44 miles of asphalt surfaced roads, 5.34 miles of Installation boundary perimeter road, plus 1.19 miles of graveled tank trails from the Harmony Church area to the new range and maneuver areas. In addition, existing training area roads and/or tank trails would be repaired or upgraded. These road improvements were analyzed in the MCoE EIS.
- Recreation Center: Construction of a new recreation center to include an auditorium with seating capacity for 1,000; stage, stage lighting, projection room; four storage rooms; three movie rooms with seating for 30 in each room; game room with eight pool tables, four air hockey tables, and two ping pong tables; video game room with 24 video games; internet room with 24 computers; three sound modules; conference room with ceiling projector and electric screen; snack bar with roll up doors over the counters; large lounge area through the facility with all other room connected off of the lounge area. This recreation center was analyzed in the BRAC and MCoE EIS. This project is approximately 0.6 miles from the proposed WTC project development area.
- Physical Fitness Center: Construction of a new physical fitness center to include a gymnasium, racquetball court, outdoor swimming pool, exercise facilities, administrative facilities, and classroom and storage areas. This physical fitness center was analyzed in the BRAC and MCoE EIS. This project is approximately 0.8 miles from the proposed WTC project development area
- Rail Loading Facility Expansion: Construction of a 26,328 linear feet of rail car storage line with crossover track and switching system south of the area known as "Ochillee Junction." The switch track consists of three railroad spurs adjacent to the Norfolk-Southern Railroad Company rail line. The expansion will include a transit loading shed and a blocking/operations building. This rail loading expansion project was analyzed in the MCoE EIS. This project is approximately 1.8 miles from the proposed WTC project development area.
- Battle Command Training Complex: The proposed Battle Command Training Center is located west of the existing cantonment area boundary with Cusseta Road to the north, First Division Road to the south, and the intersection of Highway 27/280 to the east. This facility will include approximately 46,060 square feet of training complex and is in the planning and design phase. It was analyzed in the BRAC EIS and included in the No Action alternative under the MCoE EIS. This project is approximately 0.3 miles from the proposed WTC project development area.

Potential environmental impacts from these actions were analyzed in the June 2009 Final EIS for MCoE (Fort Benning 2009b). Implementation of alternative A, the preferred alternative, would result in potential significant impacts to vegetation, wildlife, and special status species. The impacts to special-status species was addressed in the MCoE BA and associated addenda and Biological Opinion (U.S. Army Corps of Engineers 2008; Fort Benning 2009a, 2009b; U.S. Fish and Wildlife Service 2009, respectively). There would be potential moderate adverse impacts to transportation during morning and peak hours, and no significant adverse impacts to land use, utilities, hazardous materials and toxic waste, soils (as long as NPDES BMPs are implemented), or water resources (Fort Benning 2009b; 2009d).

5.8.3 Cumulative Effects Analysis

The potential exists for incremental impacts associated with this proposed action and No Action alternative to add to cumulative effects of other past, present, and future activities. This section will analyze the potential for cumulative impacts associated with implementation of the proposed action as well as the No Action alternative. The threshold criteria for cumulative impacts are the same as those described in the corresponding impact section in this chapter.

Land Use

Implementation of the proposed CTC, as well as those action in the Harmony Church area that are associated with the BRAC/Transformation and MCoE actions would not result in significant impacts to land use. However, there would be an additive impact from increasing land use intensity and density. Fort Benning's master planning process manages growth on the Installation which would identify incompatible development. As such, no significant cumulative impacts to land use are anticipated.

Under the No Action alternative, none of the construction projects would occur and there would be no changes to land use conditions. No significant cumulative impacts to land use are anticipated.

Geology and Soils

In total, construction projects currently occurring or occurring within the reasonably foreseeable future that would be considered cumulative would impact approximately 371 acres within the Camp Butler and Harmony Church areas. Exposed soils would become more susceptible to erosion, and soil productivity would also decline in disturbed areas and be completely eliminated for those areas within the footprint of paved or other hardened areas and new structures. To prevent soil erosion, erosion control measures are required to be installed and BMPs implemented for each project. In addition, temporary ground cover (e.g., mulch, seeding) is installed for areas left exposed for greater than 14 days and permanent ground cover sufficient to restrain erosion is installed following construction. Therefore, no significant cumulative impacts to geology or soils are anticipated from implementation of the proposed action.

Under the No Action alternative, none of the construction projects would occur and there would be no changes to land use conditions. As such, there would be no significant cumulative impacts to geology or soils under the No Action alternative.

Water Resources

As stated in Section 5.4, there are no wetlands or floodplains located on Camp Butler; therefore, these resources were not carried forward into the cumulative impacts analysis.

Implementation of the proposed action is likely to temporarily increase localized erosion rates to two ephemeral tributaries to Harps Creek during construction. However, BMP's implemented as required by the GDNR NPDES Construction Permit and other Federal and state regulations and permitting requirements would minimize the sedimentation into the ephemeral tributaries during demolition and construction and no water quality threshold exceedance is expected to occur. Long-term impacts due to training, operations, and maintenance activities would be minor, assuming that the ARNG would adhere to all Federal and state laws, regulations and permit requirements protecting water quality. Although there is a potential for cumulative impacts when considered with past, present, and future actions occurring near the proposed action site, they are not expected to be significant since BMPs would be incorporated into the project to prevent significant amount of sediments from entering Harps Creek and minimize impacts to water quality.

Under the No Action alternative, none of the construction projects would occur and there would be no changes to water resources. As such, significant cumulative impacts to water resources are not anticipated under the No Action alternative.

Biological Resources

As stated in Section 5.4, there are no water resources on Camp Butler to support aquatic flora or fauna; therefore, there would be no impacts to these resource areas and this resource was not carried forward into the cumulative impacts analysis.

The proposed action is located within the foraging habitat of the RCW Cluster HCC-11R. However, no vegetation supporting foraging habitat would be removed, only deadwood and underbrush. The proposed BRAC/Transformation and MCoE actions have the potential to significantly impact vegetation through removal and disturbance. Specifically, according to the 2007 BA for the BRAC/Transformation actions, three projects would impact this cluster: the Trainee Barracks Complex 1 Borrow Pit Area (PN64370), IET Brigade Headquarters Building (PN65056), and Road Improvements (PN65439). Consultation with the USFWS, when applicable, would potentially reduce the significant impact of each individual project on biological resources to the maximum extent practicable. Implementation of the MCoE preferred alternative would impact approximately 10,000 range acres, including approximately 9,000 acres of upland vegetation (Ft. Benning 2009d; 2009e). When combined with the BRAC/Transformation actions, implementation of the proposed action would not have a cumulative impact to the RCW foraging habitat.

Under the No Action alternative, none of the construction projects would occur and there would be no changes to biological resources. As such, significant cumulative impacts to biological resources are not anticipated under the No Action alternative.

Infrastructure

As part of the proposed action, it is expected that there would be short-term, minor negative impacts to transportation and traffic flow during construction with the removal of Roselle Road and construction of the main road and parking areas. However, it is expected that there would be beneficial, long-term impacts upon CTC completion from enhanced traffic flow with the new main road access and increases in parking space. When combined with the BRAC/Transformation and MCoE actions, there would be a cumulative impact to traffic flow at the Camp Butler and Harmony Church areas. These impacts are not anticipated to be significant since the overall number of personnel increase under the proposed action is negligible. As such, conditions similar to the baseline are expected.

Under the No Action alternative, none of the construction projects would occur and there would be no changes to land use conditions; therefore, no cumulative impacts would be anticipated.

Hazardous and Toxic Materials and Waste

The ROI for this resource includes the facilities on the installation where hazardous and/or toxic materials and wastes are generated and disposed. As such, the ROI includes the installation and facilities located outside the installation that are approved for disposal of hazardous and toxic wastes. No significant impacts relative to hazardous and toxic materials and waste are expected from implementation of the proposed action. There would be no increased risk to human health due to direct exposure associated with storage, use, handling, or disposal; would not substantially increase the risk of environmental contamination; or violate Federal, state, DoD, or local regulations. Furthermore, it is anticipated that disposal facilities would continue to accept hazardous and toxic wastes. As such, it is unlikely that would be a significant cumulative impact to this resource.

Under the No Action alternative, none of the construction projects would occur and there would be no changes to land use conditions; therefore no cumulative impacts would be anticipated.

6.0 COMPARISON OF ALTERNATIVES AND CONCLUSIONS

6.1 COMPARISON OF THE ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES

This EA presents the existing environmental and potential environmental consequences that could result from the proposed action and No Action alternative. A summary of impacts by resource area is presented below in Table 6-1.

Table 6-1 Comparison of Impacts for Each Resource

Resource	Alternatives	
	No Action	**Proposed Action**
Land Use	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.	No adverse impacts on land-use condition would occur. Military missions and requirements would continue to be met.
Geology and Soils	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.	Minor, short-term impacts to soils from demolition and construction activities. Continued, long-term minor impacts due to WTC training, operations, and maintenance activities.
Water Resources	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.	Minor, short-term adverse impacts are expected to surface water quality during construction; no impacts to wetlands, impaired waterways, or groundwater. Only minor long-term adverse impacts are anticipated due to training, operations, and maintenance activities.
Biological Resources	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.	Minor adverse impacts to wildlife are anticipated in the short -term. Impacts to water quality and habitat could be effectively minimized through the use of soil erosion BMPs. There would be no adverse impacts to aquatic flora and fauna, state-listed species, or Federally-listed species.
Infrastructure	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged. However, parking would remain limited and access to the WTC would continue to be compromised under the No Action alternative. Therefore, the No Action alternative could incur long-term, adverse impacts to transportation and traffic flow.	Short-term, minor adverse impacts during construction to transportation and traffic flow with removal of Roselle Road and construction of main road and parking areas. Beneficial, long-term impacts would result upon WTC Complex completion from enhanced traffic flow with the new main road access and increases in parking space. There would be no adverse impacts to utilities.
Hazardous and Toxic Materials and Waste	Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged.	No adverse impacts relative to hazardous and toxic materials and waste are expected.

6.2 CONCLUSIONS

Under the No Action alternative, the proposed action would not be implemented. Thus, baseline conditions would remain unchanged. However, as noted in Table 6-1, parking would remain limited and access to the WTC would continue to be compromised under the No Action alternative. Therefore, the No Action alternative could incur long-term, adverse impacts to transportation and traffic flow.

The proposed action has the potential to have short-term, minor adverse impacts to soil cover and stability, water resources, biological resources, and infrastructure. However, implementation of the proposed action as prescribed, including implementation of the soil erosion control BMPs and minimization measures summarized in Section 5.7, would likely not produce any significant adverse direct, indirect, or cumulative impacts. Implementation of this alternative and these measures would reduce identified impacts to acceptable levels and best fulfill the purpose of and need for the proposed action, allowing the ARNG to accomplish its mission while minimizing potential impacts to the local and regional natural, cultural, and socioeconomic environment. This EA's analysis determines, therefore, that an EIS is unnecessary for implementation of the proposed action alternative and that a FNSI is appropriate.

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8.0 LIST OF PREPARERS

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APPENDIX A
NOTICE OF AVAILABILITY, AGENCY CORRESPONDENCE, AND MAILING LIST

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NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL ASSESSMENT FOR WARRIOR TRAINING CENTER (WTC) AT FORT BENNING, GEORGIA

Pursuant to Council on Environmental Quality regulations (40 Code of Federal Regulation Parts 1500-1508) implementing the procedural provisions of the National Environmental Policy Act, the Army National Guard (ARNG) hereby gives notice that a draft Environmental Assessment (EA) has been prepared to identify and evaluate potential environmental impacts associated with establishing a Collective Training Center at the WTC located at Camp Butler, within Fort Benning, Georgia. Publication of this notice begins a 30-day public review period, which will be held from June 1, 2011 to July 1, 2011

The ARNG proposes to establish a Collective Training Center for the WTC. The proposed action includes the demolition and construction of new facilities; improvement of existing utility infrastructure, and expansion/refurbishment of the existing obstacle course and physical fitness areas. Proposed construction projects include new officer/staff barracks, troop barracks, dining facility, battalion maintenance shelter, troop medical clinic expansion, training device/simulation center, general instruction buildings base, access roads and parking areas, sidewalks, and gravel roads. Utility infrastructure improvements would include upgrades to existing or the installation of new potable-, waste-, and storm-water systems as well as power and communication lines.

The draft EA is available for a 30-day public review at the Columbus Public Library, South Columbus Public Library, and the Fort Benning Sayers Memorial Library. In addition, the draft EA will be available electronically on the Fort Benning website at:
http://www.benning.army.mil/garrison/DPW/EMD/legal.htm.

Written public comments should be addressed to: Mr. John Brent; Environmental Management Division, Chief; IMSE-BEN-PWE-P; 6650 Meloy Drive; Building 6 Meloy Hall), Room 307; Fort Benning, Georgia 31905-5122; or via e-mail john.brent@us.army.mil. To ensure proper consideration in the Final EA, please submit comments by July 1, 2011.

For further information or to request a copy of the documents, please contact the U.S. Army Maneuver Center of Excellence, Directorate of Public Works, Environmental Programs Management Branch (Attention: Mr. John E. Brown, NEPA Program Manager), Building 6 (Meloy Hall), Room 309, Fort Benning, Georgia, 31905-5122, or at (706) 545-7549.

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AGENCY CORRESPONDENCE

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STATE OF GEORGIA
DEPARTMENT OF DEFENSE

April 30, 2009

Georgia State Clearinghouse
Attn: Barbara Jackson
Administrator
270 Washington Street, SW, 8th Floor
Atlanta, GA 30334

SUBJECT: Environmental Assessment for the Georgia Army National Guard Master Plan for the Warrior Training Center at Camp Butler, Fort Benning, Georgia

Dear Ms. Jackson:

The National Guard Bureau (NGB) and the Georgia Army National Guard (GaARNG) are preparing an Environmental Assessment (EA) to evaluate the potential environmental consequences that may result from implementing the Master Plan for the Warrior Training Center (WTC) at Camp Butler, Chattahoochee County, Ft. Benning, Georgia. Camp Butler is located on about 46 acres of Federally-owned property within the boundaries of Fort Benning (please see **Attachment 1**).

Within the Master Plan, the GaARNG has identified, justified and sited a comprehensive list of proposed projects that would reshape the grounds and facilities at Camp Butler to meet increased space and training mission requirements for additional soldiers. A complete list of these projects is provided in **Attachment 2**. **Attachment 3** shows the layout of the proposed Master Plan projects.

Most of the proposed projects would occur on previously disturbed ground. Overall, a total of 15 acres of previously undisturbed property would be affected by implementation of the Master Plan. However, these 15 acres are not contiguous. This total consists of multiple, smaller areas of land within the whole 46 acre site.

The EA will evaluate the environmental, cultural, and socioeconomic impacts associated with implementing the Master Plan pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC) §4321 et seq.); the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508); and 32 CFR Part 651; as well as the NGB NEPA Manual – *Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with NEPA* (NGB, June 2006).

CFMO-Environmental Stewardship Branch
Phone: 678-569-6585

935 East Confederate Avenue, Bldg. 21

Atlanta, GA 30316
Fax: 678-569-6598

Information Request: *Information your agency can provide on any of the following environmental issue areas (at or in the vicinity of the proposed site) would be appreciated*:

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Please send your written responses via regular or e-mail to:

TEC, Inc.
10199 Southside Blvd.
Suite 105
Jacksonville, FL 32256
ATTN: Kathy Rose
Email: Klrose@tecinc.com

CFMO-Environmental Stewardship Branch
Phone: 678-569-6585

935 East Confederate Avenue, Bldg. 21

Atlanta, GA 30316
Fax: 678-569-6598

If you have any questions concerning this request, please direct them to Ms. Rose at (904) 282-2684. If you wish to discuss this project with the GaARNG directly, please contact me at 678-569-6585 or via e-mail at felicia.nichols@us.army.mil

Sincerely,

Felicia Nichols

Felicia Nichols
Environmental Project Manager

Attachment 1: Location Map
Attachment 2: List of Master Plan Projects
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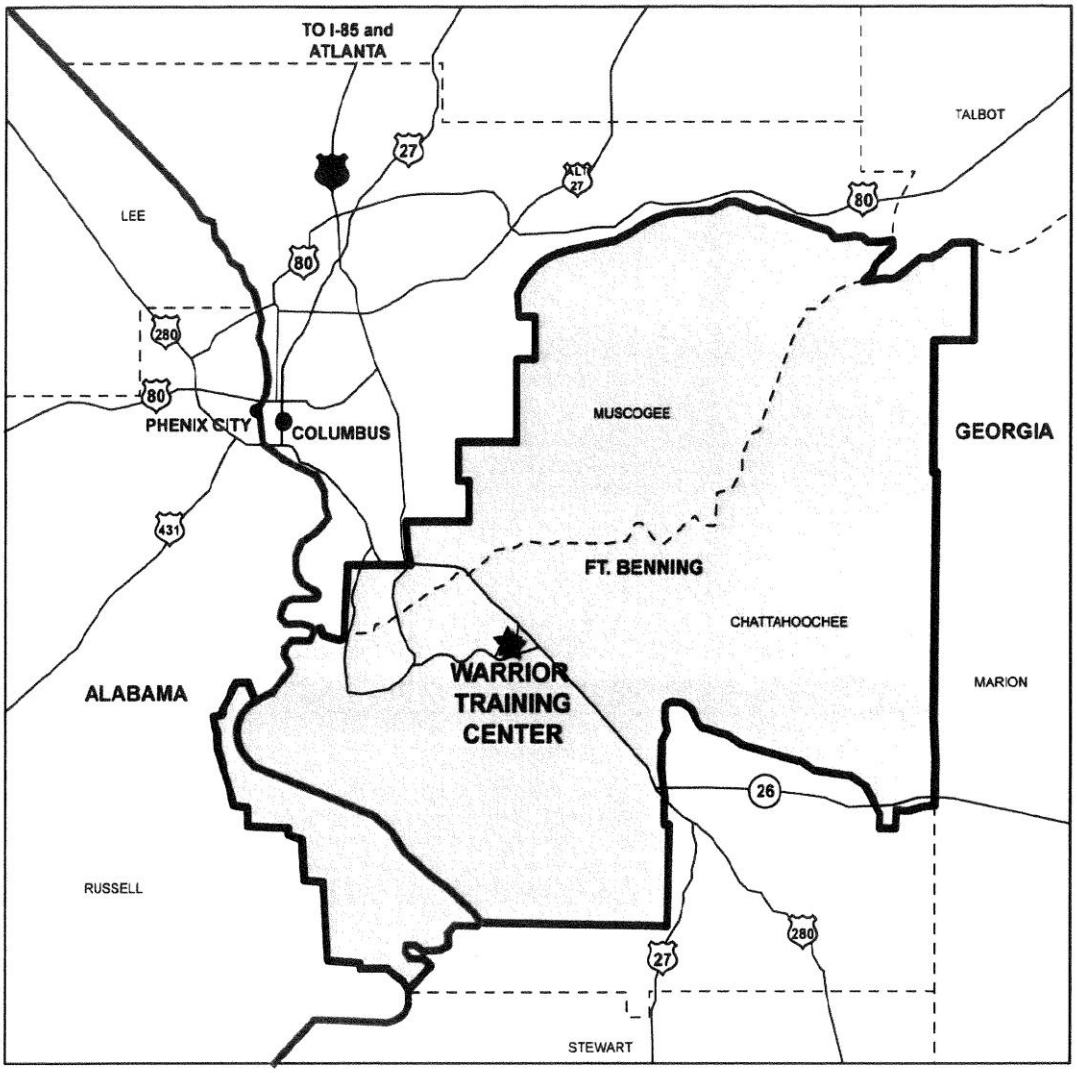
ATTACHMENT 1

Warrior Training Center Location Map



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Project Title	*Size (sf)*	*Activity Type*
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Total Area of Disturbance	646,740	(approximately 15 acres)

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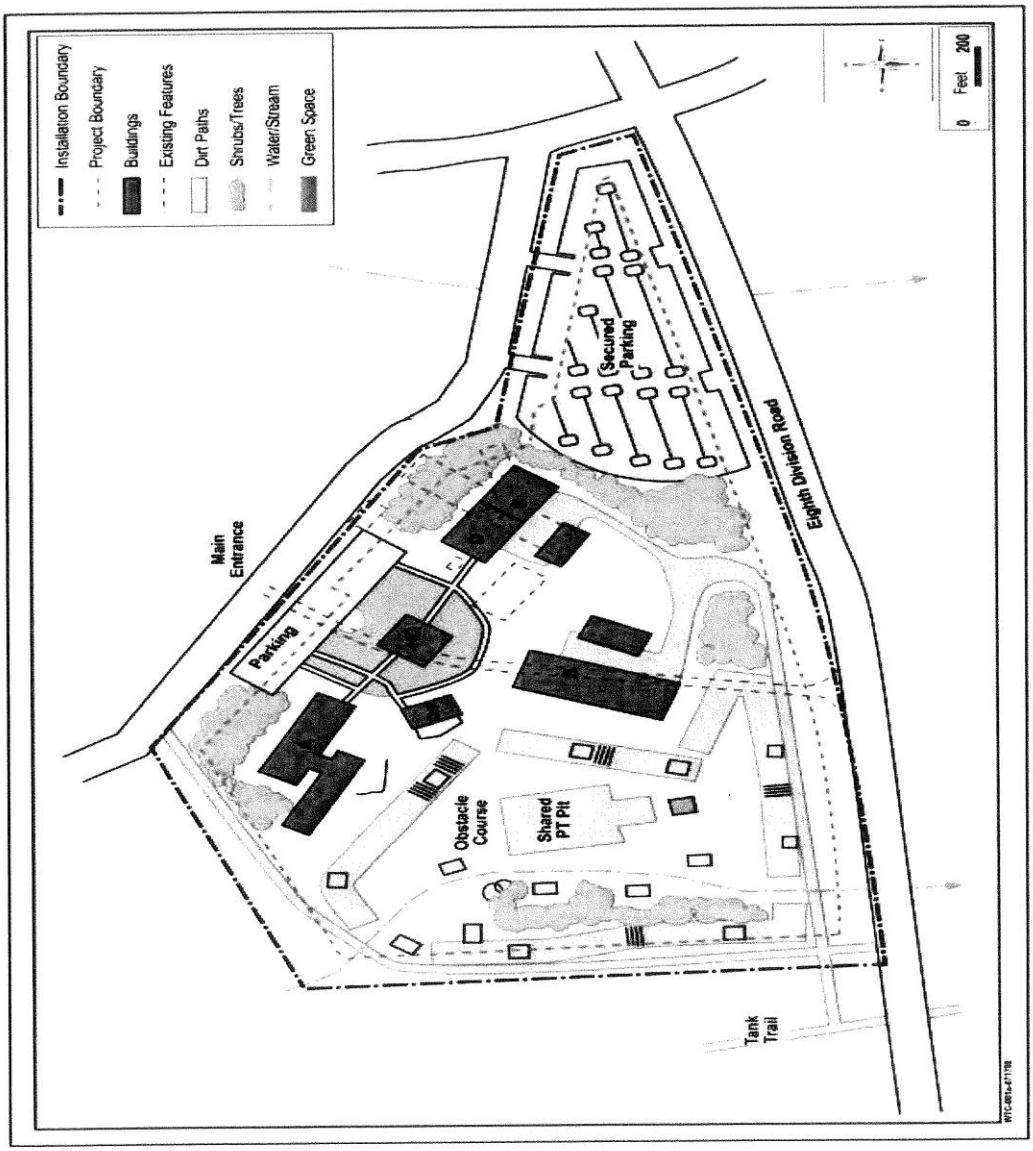
Location Site Map of Proposed Projects



ATTACHMENT 4

Warrior Training Center Environmental Assessment
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U.S. Fish & Wildlife Service
Attn: John Doresky
P.O. Box 52560
Fort Benning, GA 31995

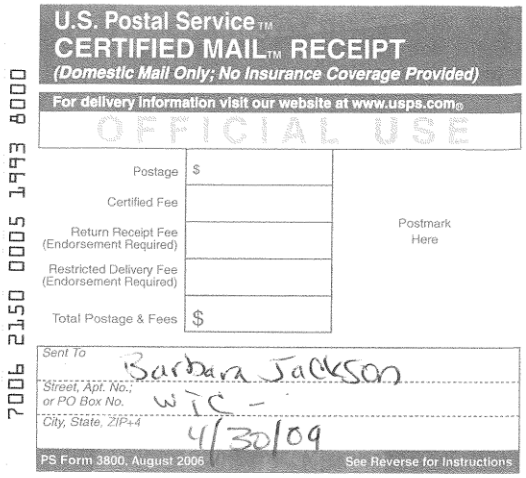
A. Stanley Meiberg
Acting Administrator, Region IV
U.S. EPA
61 Forsyth Street
Atlanta, GA 30303

Col. Edward J. Kertis, Jr.
Commander, Savannah District USACE
Post Office Box 889
Savannah, GA 31402-0889

Georgia State Clearinghouse
Ms. Barbara Jackson, Administrator
270 Washington Street, SW., 8th Floor
Atlanta, GA 30334

Mr. Ben Mosely
Region 5 Representative
Georgia Soil and Water Conservation Commission
4344 Albany Highway
Dawson, GA 39842

Mr. Ray Luce, Director
Historic Preservation Division
Georgia Department of Natural Resources
34 Peachtree Street, NW, Suite 1600
Atlanta, GA 30303



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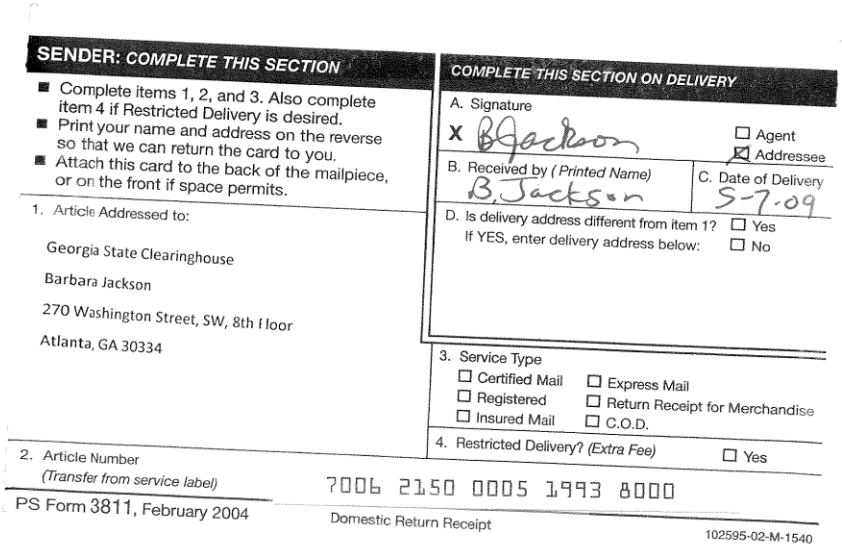
PS Form 3800, August 2006 — See Reverse for Instructions



SENDER: *COMPLETE THIS SECTION*

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1. Article Addressed to:

Georgia State Clearinghouse
Barbara Jackson
270 Washington Street, SW, 8th Floor
Atlanta, GA 30334

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X B Jackson ☐ Agent ☒ Addressee

B. Received by *(Printed Name)*: B. Jackson
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PS Form 3811, February 2004 — Domestic Return Receipt — 102595-02-M-1540

STATE OF GEORGIA
DEPARTMENT OF DEFENSE

April 30, 2009

Georgia Department. Of Natural Resources
Historic Preservation Division
Attn: Ray Luce
Director
34 Peachtree Street, NW, Suite 1600
Atlanta, GA 30303

SUBJECT: Environmental Assessment for the Georgia Army National Guard Master Plan for the Warrior Training Center at Camp Butler, Fort Benning, Georgia

Dear Mr. Luce:

The National Guard Bureau (NGB) and the Georgia Army National Guard (GaARNG) are preparing an Environmental Assessment (EA) to evaluate the potential environmental consequences that may result from implementing the Master Plan for the Warrior Training Center (WTC) at Camp Butler, Chattahoochee County, Ft. Benning, Georgia. Camp Butler is located on about 46 acres of Federally-owned property within the boundaries of Fort Benning (please see **Attachment 1**).

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CFMO-Environmental Stewardship Branch
Phone: 678-569-6585

935 East Confederate Avenue, Bldg. 21

Atlanta, GA 30316
Fax: 678-569-6598

Information Request: *Information your agency can provide on any of the following environmental issue areas (at or in the vicinity of the proposed site) would be appreciated*:

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TEC, Inc.
10199 Southside Blvd.
Suite 105
Jacksonville, FL 32256
ATTN: Kathy Rose
Email: Klrose@tecinc.com

CFMO-Environmental Stewardship Branch
Phone: 678-569-6585
935 East Confederate Avenue, Bldg. 21
Atlanta, GA 30316
Fax: 678-569-6598

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Sincerely,

Felicia Nichols

Felicia Nichols
Environmental Project Manager

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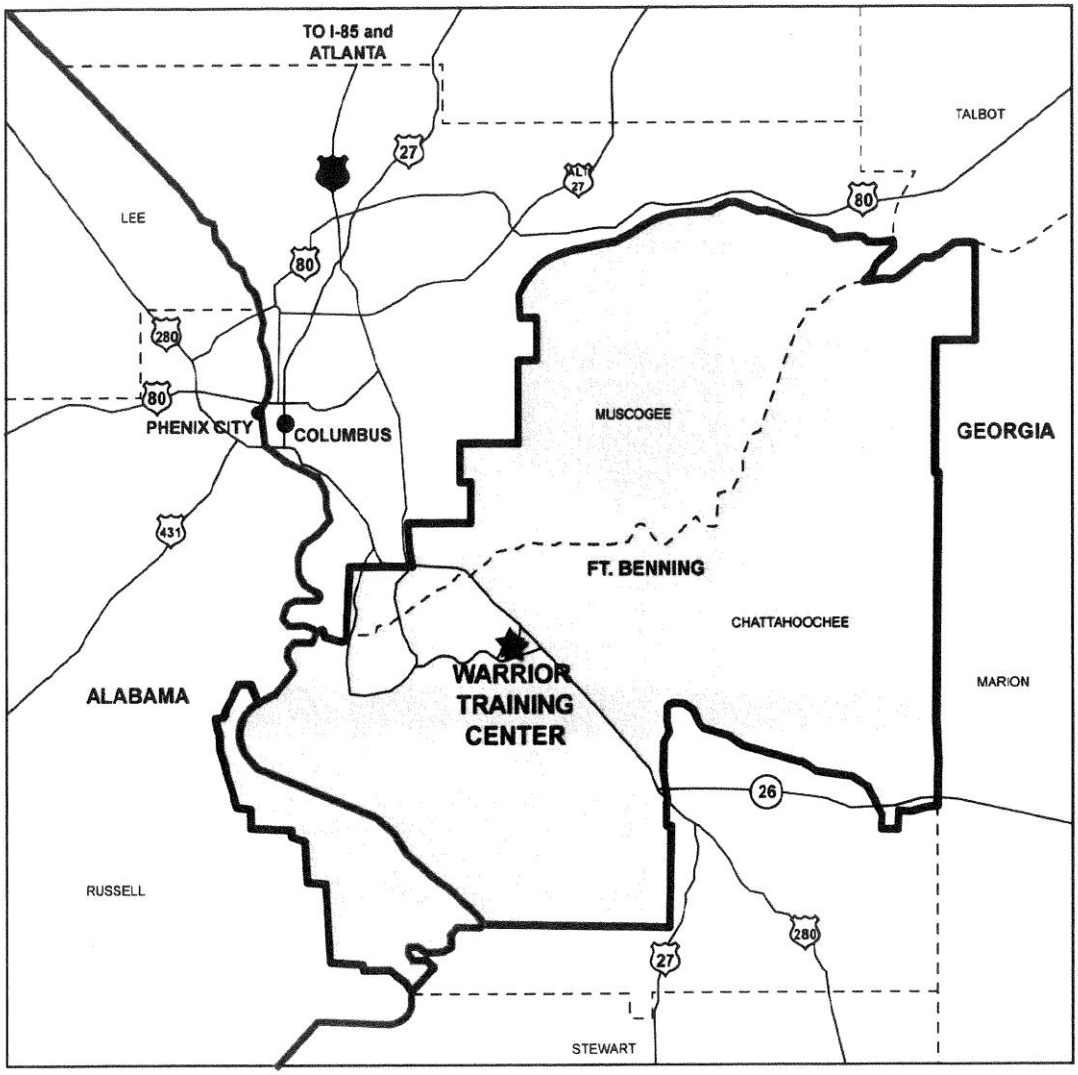

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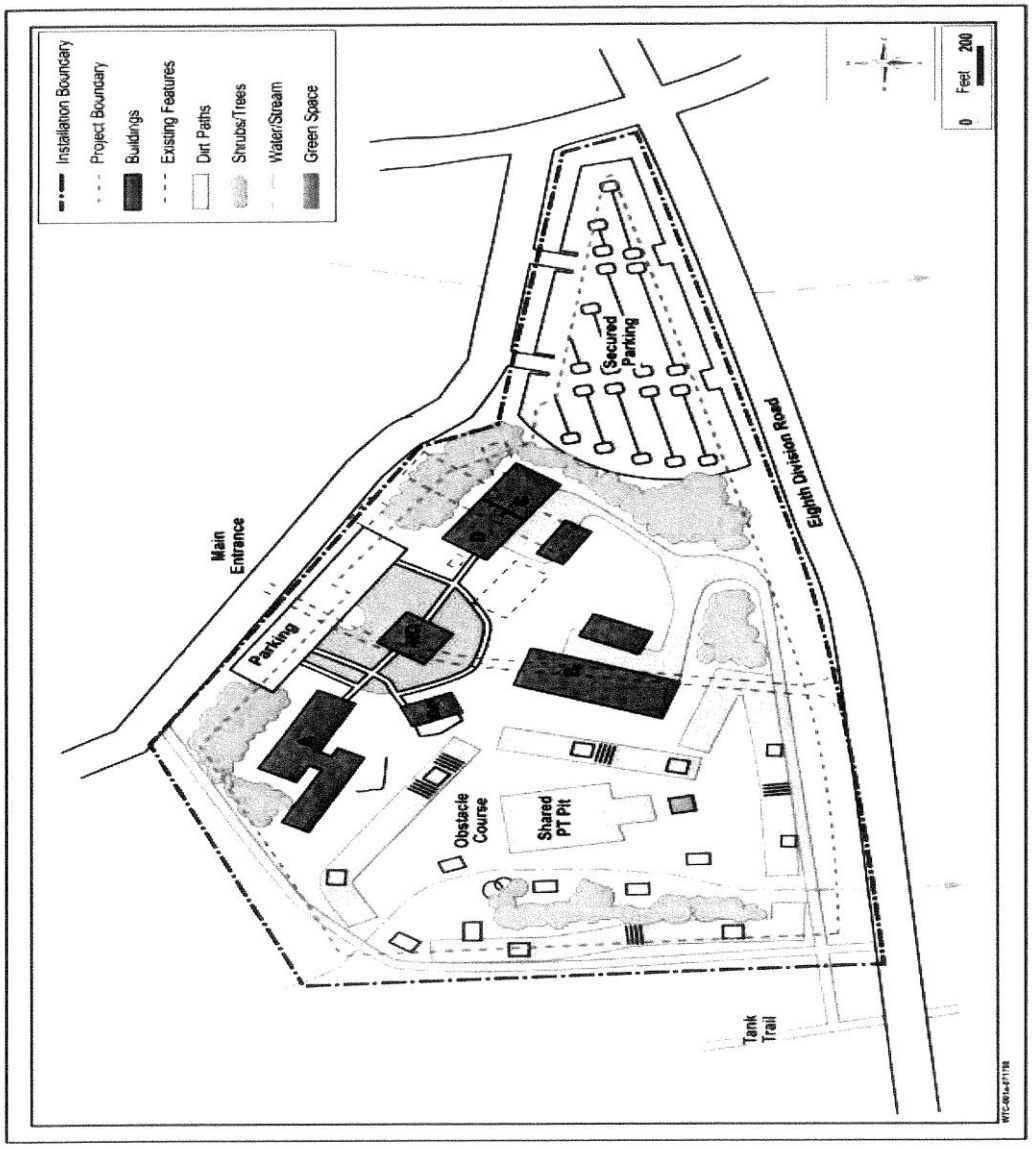

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U.S. Fish & Wildlife Service
Attn: John Doresky
P.O. Box 52560
Fort Benning, GA 31995

A. Stanley Meiberg
Acting Administrator, Region IV
U.S. EPA
61 Forsyth Street
Atlanta, GA 30303

Col. Edward J. Kertis, Jr.
Commander, Savannah District USACE
Post Office Box 889
Savannah, GA 31402-0889

Georgia State Clearinghouse
Ms. Barbara Jackson, Administrator
270 Washington Street, SW., 8th Floor
Atlanta, GA 30334

Mr. Ben Mosely
Region 5 Representative
Georgia Soil and Water Conservation Commission
4344 Albany Highway
Dawson, GA 39842

Mr. Ray Luce, Director
Historic Preservation Division
Georgia Department of Natural Resources
34 Peachtree Street, NW, Suite 1600
Atlanta, GA 30303

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Sent To: Ray Luce
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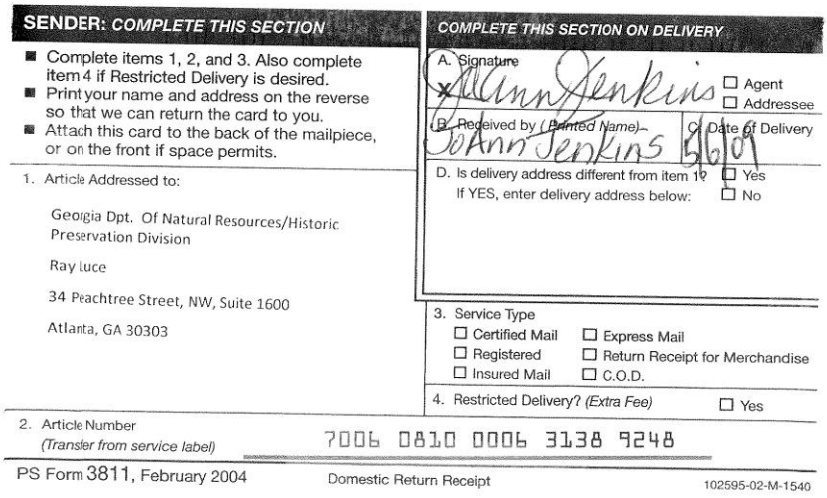
City, State, ZIP+4:

PS Form 3800, June 2002 — See Reverse for Instructions



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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Georgia Dpt. Of Natural Resources/Historic Preservation Division

Ray Luce

34 Peachtree Street, NW, Suite 1600

Atlanta, GA 30303

COMPLETE THIS SECTION ON DELIVERY

A. Signature: X JoAnn Jenkins ☐ Agent ☐ Addressee

B. Received by (Printed Name): JoAnn Jenkins C. Date of Delivery: 5/6/09

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
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☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7006 0810 0006 3138 9248

PS Form 3811, February 2004 — Domestic Return Receipt — 102595-02-M-1540

STATE OF GEORGIA
DEPARTMENT OF DEFENSE

April 30, 2009

USACE
Attn: Col. Edward J. Kertis, Jr
Commander, Savannah District
P.O. Box 889
Savannah, GA 31402-0889

SUBJECT: Environmental Assessment for the Georgia Army National Guard Master Plan for the Warrior Training Center at Camp Butler, Fort Benning, Georgia

Dear Col. Kertis:

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CFMO-Environmental Stewardship Branch
Phone: 678-569-6585

935 East Confederate Avenue, Bldg. 21

Atlanta, GA 30316
Fax: 678-569-6598

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Please send your written responses via regular or e-mail to:

TEC, Inc.
10199 Southside Blvd.
Suite 105
Jacksonville, FL 32256
ATTN: Kathy Rose
Email: Klrose@tecinc.com

CFMO-Environmental Stewardship Branch
Phone: 678-569-6585
935 East Confederate Avenue, Bldg. 21
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Felicia Nichols

Felicia Nichols
Environmental Project Manager

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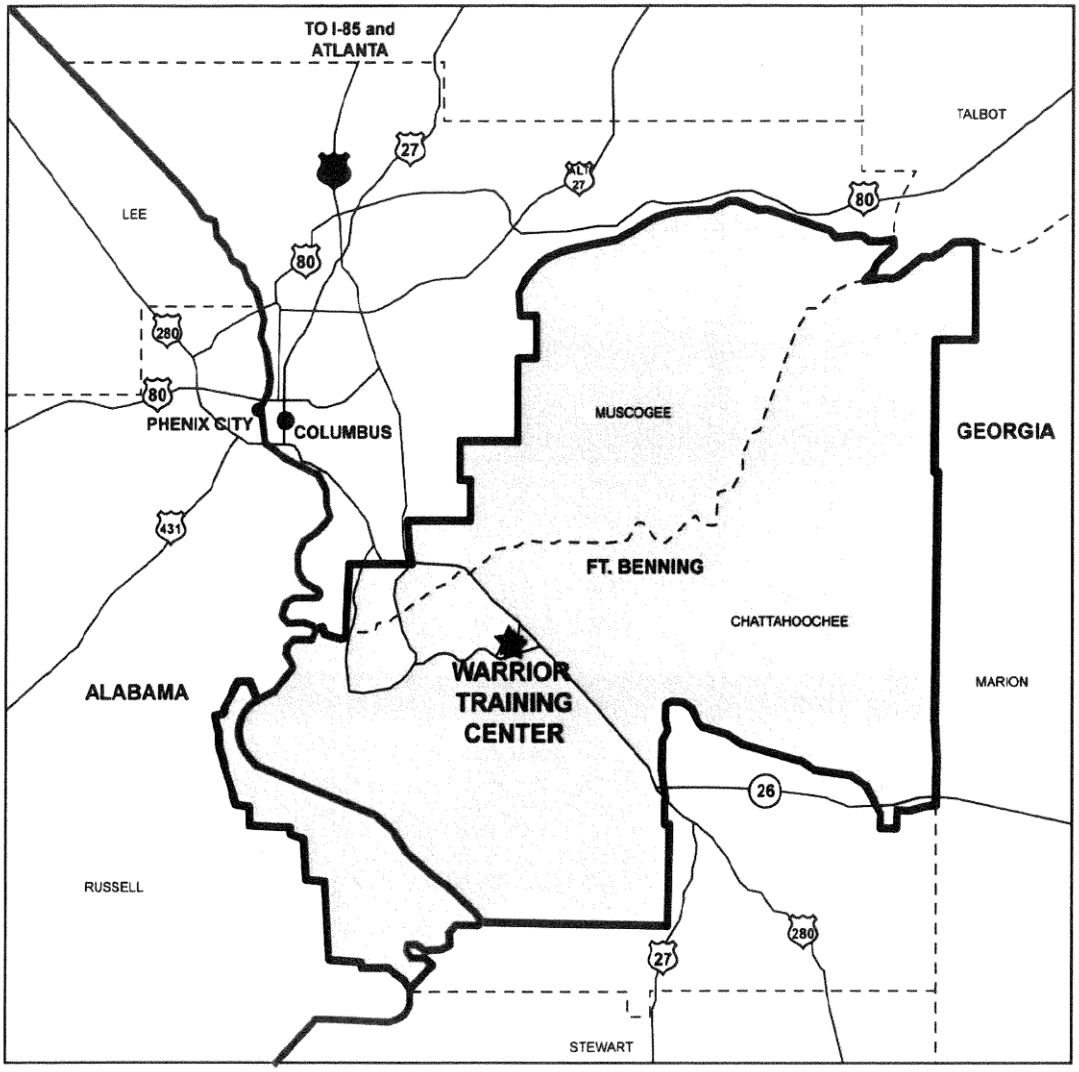

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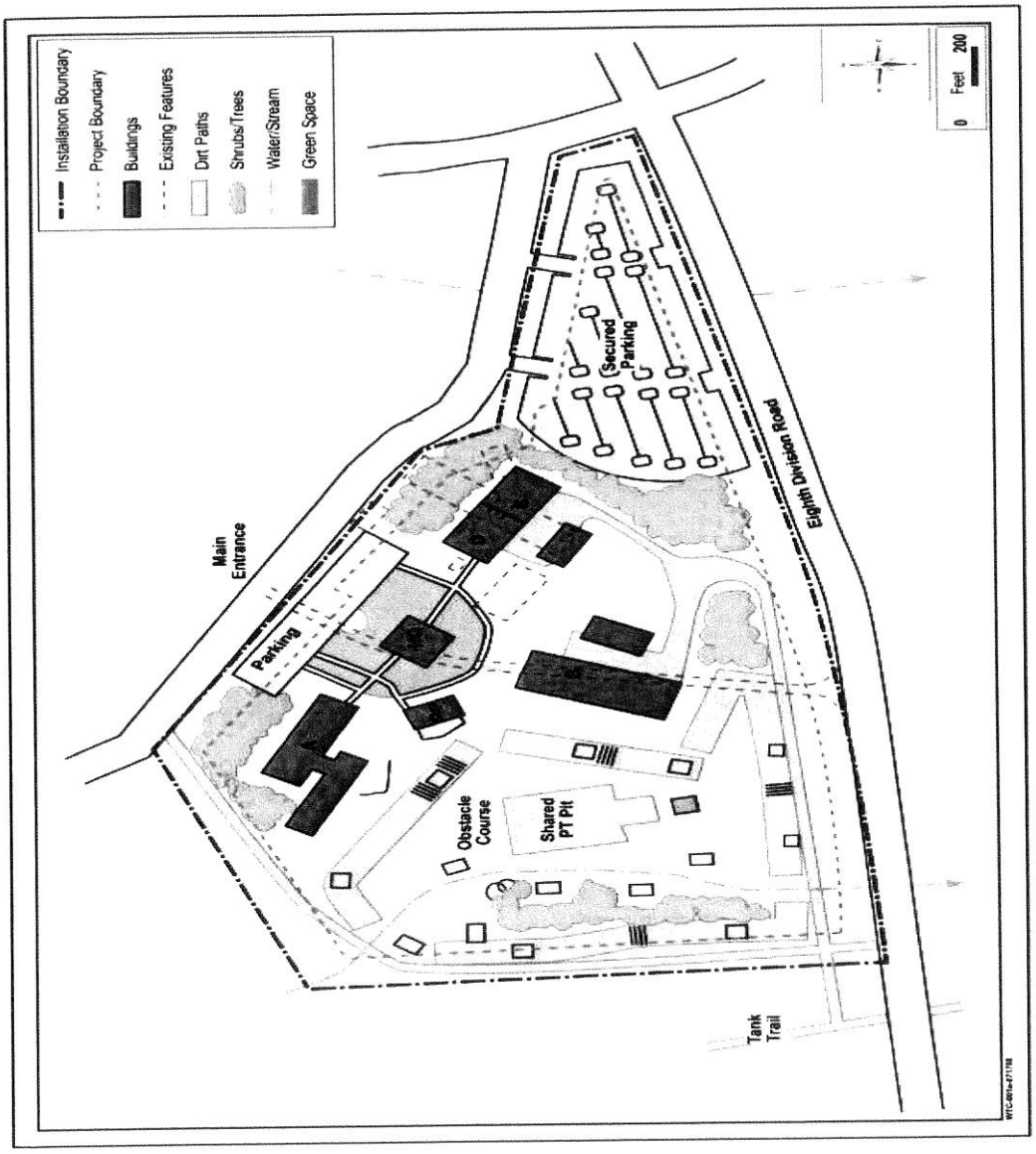
ATTACHMENT 3

Location Site Map of Proposed Projects



ATTACHMENT 4

Warrior Training Center Environmental Assessment
List of Agencies and Organizations Contacted

U.S. Fish & Wildlife Service
Attn: John Doresky
P.O. Box 52560
Fort Benning, GA 31995

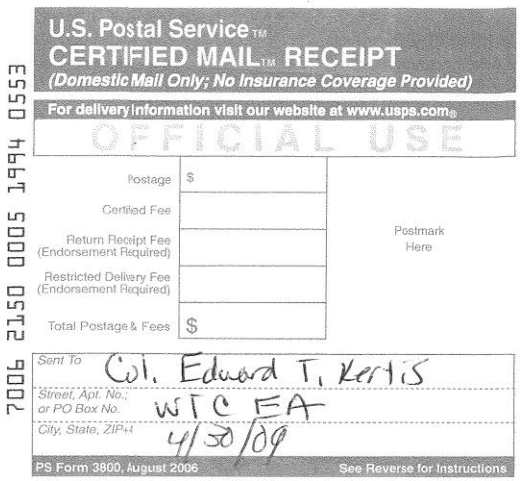
A. Stanley Meiberg
Acting Administrator, Region IV
U.S. EPA
61 Forsyth Street
Atlanta, GA 30303

Col. Edward J. Kertis, Jr.
Commander, Savannah District USACE
Post Office Box 889
Savannah, GA 31402-0889

Georgia State Clearinghouse
Ms. Barbara Jackson, Administrator
270 Washington Street, SW., 8th Floor
Atlanta, GA 30334

Mr. Ben Mosely
Region 5 Representative
Georgia Soil and Water Conservation Commission
4344 Albany Highway
Dawson, GA 39842

Mr. Ray Luce, Director
Historic Preservation Division
Georgia Department of Natural Resources
34 Peachtree Street, NW, Suite 1600
Atlanta, GA 30303



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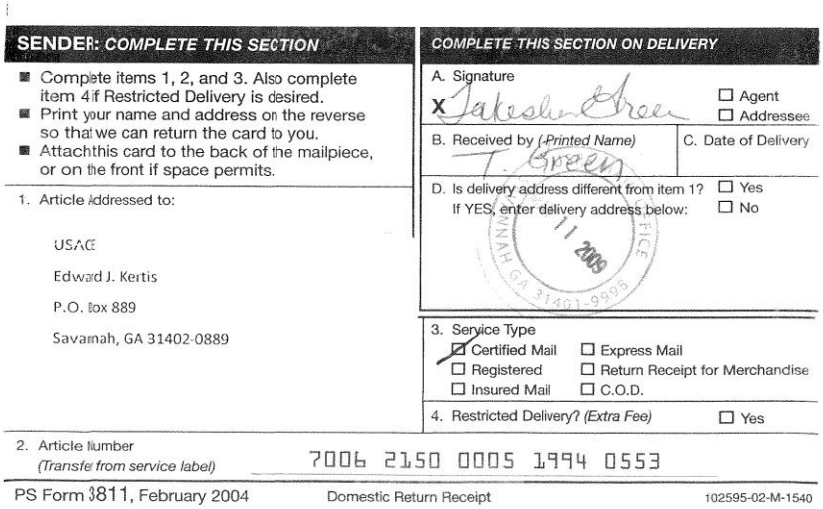
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Col. Edward T. Kertis
Street, Apt. No., or PO Box No.: WTC EA
City, State, ZIP+4: 4/30/09

PS Form 3800, August 2006 — See Reverse for Instructions



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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

USACE
Edward J. Kertis
P.O. Box 889
Savannah, GA 31402-0889

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Jakeshia Green ☐ Agent ☐ Addressee

B. Received by *(Printed Name)*: T. Green — C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

SAVANNAH GA 31401-9998 11 2009

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☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

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PS Form 3811, February 2004 — Domestic Return Receipt — 102595-02-M-1540

ATTACHMENT 4

Warrior Training Center Environmental Assessment
List of Agencies and Organizations Contacted

U.S. Fish & Wildlife Service
Attn: John Doresky
P.O. Box 52560
Fort Benning, GA 31995

A. Stanley Meiberg
Acting Administrator, Region IV
U.S. EPA
61 Forsyth Street
Atlanta, GA 30303

Col. Edward J. Kertis, Jr.
Commander, Savannah District USACE
Post Office Box 889
Savannah, GA 31402-0889

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Ms. Barbara Jackson, Administrator
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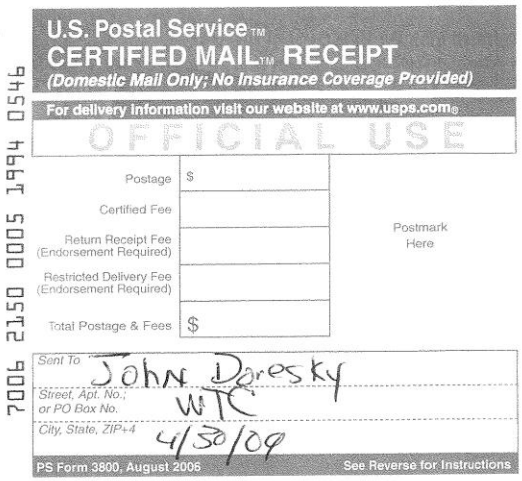
Mr. Ben Mosely
Region 5 Representative
Georgia Soil and Water Conservation Commission
4344 Albany Highway
Dawson, GA 39842

Mr. Ray Luce, Director
Historic Preservation Division
Georgia Department of Natural Resources
34 Peachtree Street, NW, Suite 1600
Atlanta, GA 30303



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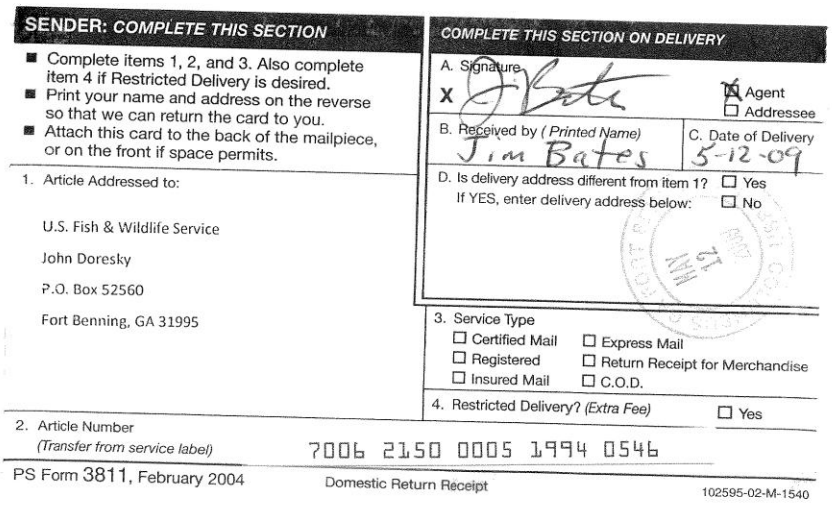
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: John Doresky
Street, Apt. No., or PO Box No.: WTC
City, State, ZIP+4: 4/30/09

PS Form 3800, August 2006 — See Reverse for Instructions



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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

U.S. Fish & Wildlife Service
John Doresky
P.O. Box 52560
Fort Benning, GA 31995

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☒ Agent ☐ Addressee

B. Received by *(Printed Name)*: Jim Bates
C. Date of Delivery: 5-12-09

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7006 2150 0005 1994 0546

PS Form 3811, February 2004 — Domestic Return Receipt — 102595-02-M-1540

MAILING LIST

Ms. Augustine Asbury
Cultural Preservation Officer
Alabama/Quassarte Tribe of OK
P.O. Box 187
Wetumka, Oklahoma 74880

Mr. Ted Isham
Manager, Cultural Preservation Office
Muscogee (Creek) Nation of OK
Cultural Preservation Office
P.O. Box 580
Okmulgee, Oklahoma 74447

Mr. Brian Celestine
Historic Preservation Officer
Alabama-Coushatta Tribe of Texas
571 State Park Road 56
Livingston, Texas 77351

Mr. Ken Carlton
Tribal Hist. Pres Officer
Mississippi Band of Choctaw Indians
P.O. Box 6010
Choctaw, Mississippi 39350

Mr. Charles Coleman
Representative
Thlopthlocco Tribal Town
P.O. Box 188
Okemah, Oklahoma 74859

Ms. Natalie Deere
Historic Preservation Officer
Seminole Nation of Oklahoma
P.O. Box 1498
Wewoka, Oklahoma 74884

Mr. John Doresky
U.S. Fish and Wildlife Service
P.O. Box 52560
Fort Benning, GA 31995

Mr. Henry Harjo
Representative
Kialegee Tribal Town
P.O. Box 332
Wetumka, Oklahoma 74883

Ms. Barbara Jackson
Administrator
Georgia State Clearinghouse
270 Washington Street SW, 8th Floor
Atlanta, GA 30334

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USACE, Savannah District
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Mr. David Crass, Director
Historic Preservation Division
Georgia Department of Natural Resources
34 Peachtree Street NW, Suite 1600
Atlanta, GA 30303

Mr. A. Stanley Meiberg
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U.S. EPA, Region IV
61 Forsyth Street
Atlanta, GA 30303

Mr. Ben Mosely
Region 5 Representative
Georgia Soil and Water Conservation
Commission
4344 Albany Highway
Dawson, GA 39842

Ms. Gingy Nail
Director of Cultural Resources
Chickasaw Nation
P.O. Box 1548
Ada, Oklahoma 74820

Mr. Willard Steele
Deputy Tribal Historic Preservation Officer
Seminole Tribe of Florida
AH-THA-THI-KI Museum
HC 61, Box 21A
Clewiston, Florida 33440

Ms. Lisa LaRue
Representative
United Keetoowah Band of the Cherokee
Indians of Oklahoma
P.O. Box 746
Tahlequah, Oklahoma 74465

Mr. Robert Thrower
Tribal Historic Preservation
Poarch Band of Creek Indians
5811 Jack Springs Rd
Atmore, Alabama 36502

APPENDIX B
CULTURAL RESOURCES – MEMORANDUM FOR THE RECORD

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IMSE-BEN-PWN-P 23 May 11

MEMORANDUM FOR RECORD

SUBJECT: ARMY NATIONAL GUARD WARRIOR TRAINING CENTER MASTER PLAN

1. The Georgia Army Nation Guard proposes to construct a Warrior Training Center in the vicinity of Harmony Church, Fort Benning Georgia (map enclosed).

2. A review of the project for potential effects on historic properties (archeological sites, historic buildings, et al) indicates that the project area has been surveyed for historic properties and that there are no effects to any historic properties within the area of project effects.

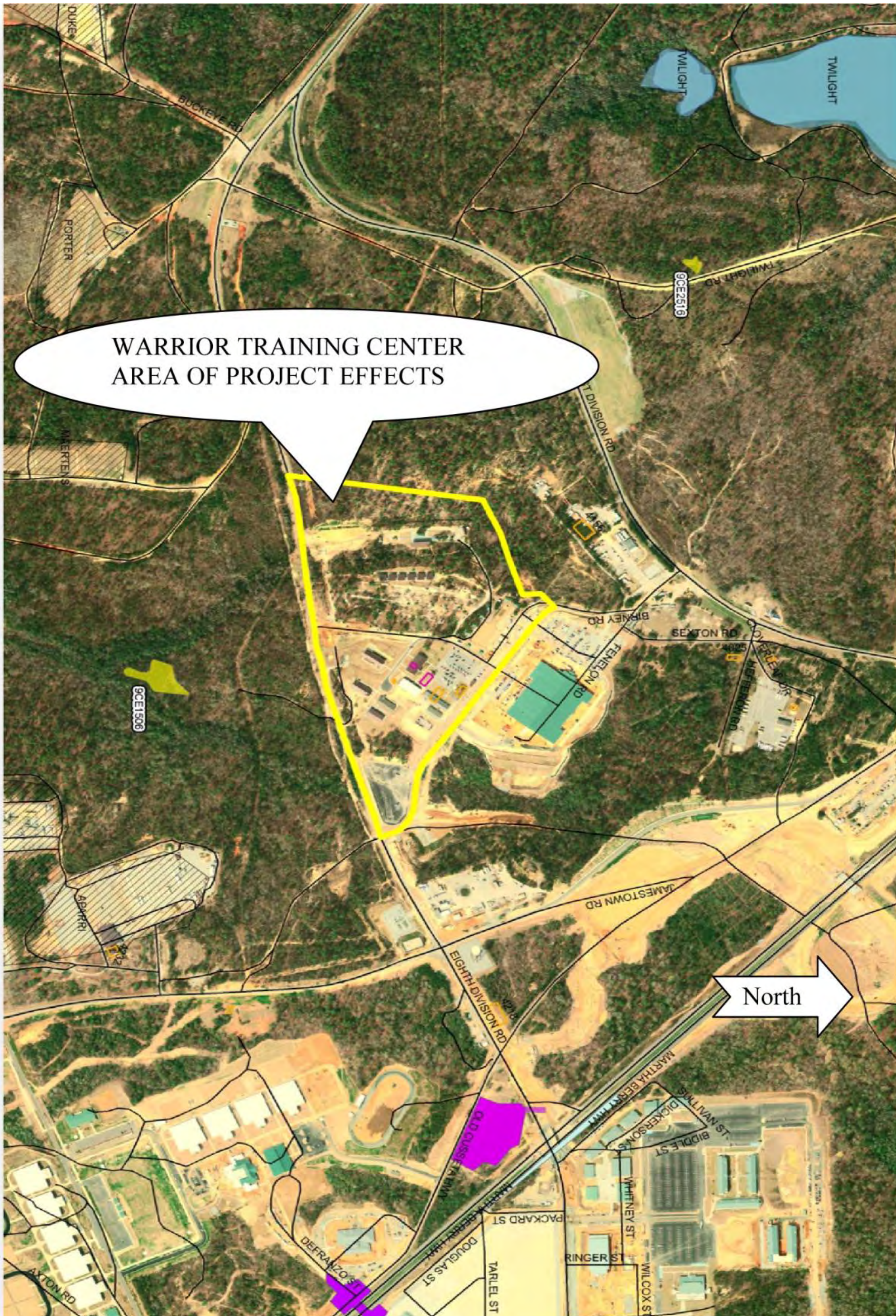
3. Determinations of effect are the responsibility of Fort Benning per the Historic Properties Component of the Integrated Cultural Resource Management Plan, the Army's Alternate Procedure for compliance with Section 106 of the National Historic Preservation Act. Fort Benning meets twice yearly with eleven federally recognized Tribes (Tribes) and the Georgia Historic Preservation Division of the Georgia Department of Natural Resource (aka SHPO) in compliance with the above procedures and consults on projects which may affect historic properties on the installation. Also, the proposed project area has been part of past consultations between the Tribes and the Georgia Army National Guard and no concerns were raised.

4. Should an inadvertent find of archeological materials or human remains occur, work must stop in the vicinity of the find and the Cultural Resource Manager, Dr. Christopher E. Hamilton telephone: (706) 545-4211 is to be contacted. Alternatively, please call Mr. Christopher Parr, archaeologist/site monitor at (520) 834-3721.

Christopher E. Hamilton

Encl

CHRISTOPHER E. HAMILTON
Chief, Environmental Programs Management Branch


WARRIOR TRAINING CENTER
AREA OF PROJECT EFFECTS
North
TWILIGHT
TWILIGHT
TWILIGHT RD
BUCKEYE RD
PORTER
9CE2516
9CE1506
BIRNEY RD
SEXTON RD
FENELON RD
JAMESTOWN RD
EIGHTH DIVISION RD
MARTHA BERRY HWY
SULLIVAN ST
DICKERSON ST
BIDDLE ST
WHITNEY ST
PACKARD ST
RINGER ST
WILCOX ST
DOUGLAS ST
TARLEL ST
DEFRANZO ST
AXTON RD
OLD CUSSETA RD